

**Official Transcript of Proceedings**  
**NUCLEAR REGULATORY COMMISSION**

Title:                   ACRS Fuels, Materials, and Structure  
                              Subcommittee

Docket Number:    n/a

Location:            teleconference

Date:                 05-18-2023

Work Order No.:    NRC-2407

Pages 1-260

**NEAL R. GROSS AND CO., INC.**  
**Court Reporters and Transcribers**  
1716 14th Street, N.W.  
Washington, D.C. 20009  
(202) 234-4433

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

DISCLAIMER

UNITED STATES NUCLEAR REGULATORY COMMISSION'S  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

The contents of this transcript of the proceeding of the United States Nuclear Regulatory Commission Advisory Committee on Reactor Safeguards, as reported herein, is a record of the discussions recorded at the meeting.

This transcript has not been reviewed, corrected, and edited, and it may contain inaccuracies.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

(202) 234-4433

[www.nealrgross.com](http://www.nealrgross.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

+ + + + +

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

+ + + + +

FUELS, MATERIALS AND STRUCTURES SUBCOMMITTEE

+ + + + +

THURSDAY

MAY 18, 2023

+ + + + +

The Subcommittee met via hybrid in-person and Video Teleconference, at 8:30 a.m. EDT, Ron Ballinger, Chairman, presiding.

COMMITTEE MEMBERS:

RONALD G. BALLINGER, Chair

VICKI BIER, Member

VESNA DIMITRIJEVIC, Member

GREGORY HALNON, Member

WALT KIRCHNER, Member

JOSE MARCH-LEUBA, Member

DAVID PETTI, Member

JOY L. REMPE, Member

MATTHEW SUNSERI, Member

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 ACRS CONSULTANT:

2 DENNIS BLEY

3

4 DESIGNATED FEDERAL OFFICIAL:

5 CHRISTOPHER BROWN

6

7 ALSO PRESENT:

8 HATICE AKKURT, EPRI

9 MARKUS BURKARDT, Dominion

10 NATHAN GLUNT, EPRI

11 ROBERT HALL, EPRI

12 CRAIG HARRINGTON, EPRI

13 AYLIN KUCUK, EPRI

14 SCOTT MOORE, ACRS

15 KURSHAD MUFTUOGLU, EPRI

16 DAVID PERKINS, EPRI

17 AL SANTOS, NEI

18 FRED SMITH, EPRI

19 DAN WELLS, EPRI

20 ERICH WIMMER, EPRI

21 SURESH YAGNIK, EPRI

22

23

24

25

C-O-N-T-E-N-T-S

	<u>PAGE</u>
1	
2	
3	Opening Remarks and Objectives. . . . . 5
4	EPRI Opening Remarks. . . . . 8
5	KOH for PWR RCS pH Control: Radiological
6	Impacts.. . . . . 14
7	EPRI Fuel Reliability Program Overview. . . . . 39
8	XLPR Methodology - Probabilistic Fracture
9	Mechanics for PWR Piping. . . . . 66
10	EPRI Alternative Licensing Strategy -
11	New Approach to Address FFRD. . . . . 116
12	Atomistic Modeling of Cladding Coating
13	Behavior. . . . . 154
14	Fuel Fragmentation Threshold. . . . . 171
15	EPRI Used Fuel High Level Waste
16	Program Overview. . . . . *
17	SFP Criticality for ATF/HE/HBU: Depletion Uncertainty
18	and Criticality Code Validation.. . . . . 184
19	Scoping Analysis for Decay Heat and
20	Radiation Dose for ATF/HE/HBU.. . . . . 205
21	Collaborative Research on Advanced Fuel
22	Decay Heat: EPRI-SKB Collaboration
23	for Extending Validation Range. . . . . 234
24	Open Discussion.. . . . . 249
25	Technologies (CRAFT). . . . . 249

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1	Open Discussion.. . . . .	260
2	Adjourn.. . . . .	260
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		

P-R-O-C-E-E-D-I-N-G-S

8:30 a.m.

CHAIR BALLINGER: Okay, the meeting will now come to order. This is a meeting of the Fuels Materials and Structures Subcommittee of the Advisory Committee on Reactor Safeguards. I'm Ron Ballinger, chairman of today's subcommittee meeting. ACRS members present are Jose March-Leuba, Matt Sunseri, Dave Petti, Joy Rempe, Vicki Bier, and Gregory Halnon. And remotely we have Walt Kirchner, and Vesna Dimitrijevic.

And we may have Dennis Bley, one of our consultants, I don't know for sure.

MEMBER SUNSERI: He's there.

CHAIR BALLINGER: He's there, okay. And I'm probably missing somebody, and I'll be chastised for that, but nonetheless, here we go. Chris Brown of the ACRS staff is the designated federal official for this meeting. During today's meeting, the subcommittee will receive a fuels information slash update from EPRI. The subcommittee will hear presentations by, and hold discussions with EPRI, and other interested persons regarding this matter.

This meeting is open to the public. The rules for participation in all ACRS meetings were

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 announced in the Federal Register on June the 13th,  
2 2019. U.S. NRC public website provides the ACRS  
3 charter, bylaws, agendas, letter reports, and full  
4 transcripts of all full, and subcommittee meetings  
5 including the slides. The agenda for this meeting was  
6 posted there, along with the MS Teams link.

7 We have received no written statements, or  
8 requests to make oral statements from the public.  
9 Subcommittee will gather information, analyze relevant  
10 issues, and facts, informing proposed positions, and  
11 actions as appropriate for deliberation by the full  
12 committee. A transcript of the meeting is being kept,  
13 and will be made available. Today's meeting is being  
14 held in person, and over Microsoft Teams.

15 There is also a telephone bridge line, and  
16 an MS Teams link allowing participation of the public.  
17 When addressing the subcommittee the participants  
18 should first identify themselves, and speak with  
19 sufficient clarity, and volume, so that they may be  
20 readily heard. When not speaking, we request that  
21 participants mute your computer microphone, or other  
22 phone by pressing star six.

23 This is the second of four meetings with  
24 EPRI. We've already covered the materials reliability  
25 issues core type materials on March the 22nd, and I

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 might add that was an outstanding meeting. Very  
2 detailed, and very well received. The next meeting is  
3 on June the 22nd for half a day on I&C. The final  
4 meeting, which is related to balanced plant materials  
5 issues, we're working on an agenda, and a time for  
6 that, but it's a bit in the future.

7 So, we planned to take about an hour, and  
8 a half for lunch, but it turns out that the food court  
9 slash whoever it's called themselves downstairs will  
10 be here today. So, since you folks have identified  
11 that you'll eat there, we'll do an hour for lunch, but  
12 we'll try to leave a little bit early to avoid any  
13 lines downstairs. So, we'll try to finish for this  
14 morning at around 11:45, and then convene back around  
15 12:45.

16 Finally, for information purposes, if  
17 members have had a chance to look at the Sharepoint  
18 site, there's an enormous amount of material that EPRI  
19 has provided for us to look through. A lot of it's  
20 related to chemistry issues, and there's a recent EPRI  
21 report where they use Gothic to identify consequence  
22 scenarios for canister leaks, which is an interesting  
23 report to take a look at.

24 And so, lastly, before we get started,  
25 since many of us don't know the EPRI folks that are

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 here, except for maybe a few, what I'd like to do  
2 before we get formally started is to go around the  
3 room so that the EPRI folks can who they are, and what  
4 they do, because we're unfamiliar. So, can we start  
5 with Dan, and then just loop around, I guess?

6 MR. WELLS: Yeah, sure, we can start with  
7 me.

8 CHAIR BALLINGER: Yeah, thanks.

9 MR. WELLS: Dan Wells, I'm the director  
10 for fuels, and chemistry. I've been in the role since  
11 November of last year, been in EPRI around 12 years.  
12 I have oversight for the chemistry radiation safety  
13 decommissioning programs at EPRI, as well as both the  
14 operating fuels program, fuels research, and back end  
15 used fuel high level waste program. Ron, before we  
16 keep going, do you want to do the EPRI stuff that's on  
17 the phone line too, or just in the room?

18 CHAIR BALLINGER: I didn't realize that.  
19 Yeah, why not?

20 MR. WELLS: Okay, we'll go to the phone  
21 after we do the room.

22 CHAIR BALLINGER: Okay, thank you.

23 MS. AKKURT: Okay, I am Hatice Akkurt, I  
24 am a technical staff in EPRI's used fuel, and high  
25 level waste management program. In my role I'm

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 leading a number of projects related to that storage,  
2 whether it's spent fuel, fuel criticality, or neutron  
3 absorber material degradation, or also decay heat. I  
4 am also the coordinator for our extended storage  
5 collaboration program, which is called ESCAPE.

6 CHAIR BALLINGER: I should mention that  
7 these microphones are very directional, and you almost  
8 have to be on top of them. So, be aware that --

9 MEMBER MARCH-LEUBA: Do as he says, not as  
10 he does.

11 CHAIR BALLINGER: My cord, it won't go any  
12 further, but believe me -- okay, next please.

13 MS. KUCUK: Okay, my name is Aylin Kucuk,  
14 I am the program manager of nuclear fuels at EPRI. I  
15 have been in this position since December, and I am  
16 overseeing our fuel reliability program, as well as  
17 NRYR program at EPRI. And I have been with EPRI since  
18 2006.

19 MR. HALL: My name is Robert Hall, I am  
20 the outgoing program manager at used fuel, and high  
21 level waste, the same group that Hatice is in. I've  
22 been at EPRI about two, and a half years, and did some  
23 other things before that, mainly in criticality, and  
24 spent fuel pool primarily, and also core design.

25 MR. SMITH: Fred Smith, I'm the senior

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 technical executive for the fuel reliability program.  
2 I primarily work on high burn up, high enrichment ATF  
3 projects, I've been at EPRI for six years, and before  
4 that I spent 40 years in the industry with various  
5 organizations.

6 MR. MUFTUOGLU: Hi, my name is Kurshad  
7 Muftuoglu, I am a technical executive with the fuel  
8 reliability program at EPRI. I've been with EPRI  
9 since last September, and I'm working on the fuel  
10 issues, advanced fuel technologies, and coordinating  
11 the CRAFT framework.

12 CHAIR BALLINGER: I'm not sure how we do  
13 the folks that are sitting here -- that'll work, okay.

14 MR. HARRINGTON: So, I am Craig Harrington  
15 with -- I'm actually not part of the fuels, and  
16 chemistry crowd, I'm with EPRI materials reliability  
17 program here supporting the discussion on XLPR. Been  
18 with EPRI since 2006.

19 MR. BURKARDT: Hi, I'm Markus Burkardt,  
20 I'm at Dominion Engineering, and I support Craig  
21 Harrington at EPRI in a lot of different areas, but  
22 here I'm supporting regarding work that we're doing  
23 for XLPR.

24 MR. WELLS: And then online, I think we  
25 have David Perkins.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. PERKINS: Good morning, my name is  
2 David Perkins, I am a senior technical executive  
3 working in the water chemistry, radiation safety area.  
4 My main focus has been working in the radiation safety  
5 area for the last couple years, and I have been with  
6 EPRI since 2004.

7 MR. WELLS: Thank you, David. Nathan  
8 Glunt?

9 MR. GLUNT: Hey, I'm Nate Glunt, I am also  
10 from EPRI's materials reliability program, working  
11 with Craig, and Markus on XLPR.

12 MR. WELLS: And then Erich Wimmer.

13 MR. WIMMER: Yeah, this is Erich Wimmer  
14 from the company Materials Design, and we are  
15 providing for many, many years atomistic modeling  
16 services to various EPRI projects, in particular to  
17 the ATF, and to the HPU programs.

18 CHAIR BALLINGER: An my understanding is  
19 that Al Santos is stuck in security down below.

20 MR. WELLS: I just got a message from Al  
21 saying where should I go -- where should I meet my  
22 escort, that's what he said.

23 CHAIR BALLINGER: He's a former NRC  
24 employee, so he should know the ropes on how to get  
25 into this building, but --

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. WELLS: Do you want me to tell him to  
2 meet at the lobby, is somebody already going? Okay,  
3 thank you.

4 CHAIR BALLINGER: Okay, Dan, do you want  
5 to say anything else by way of introduction?

6 MR. WELLS: Well, I have a couple of  
7 slides, so just very briefly. So, the programs I  
8 introduced myself, and told you what I have oversight  
9 for at EPRI, but really we work in the fuels, and  
10 chemistry area on the fuel colliding boundary  
11 basically, the first primary containment boundary. A  
12 lot of the work is on optimization efficiency  
13 opportunities, as well as efficient, and safe waste  
14 disposal for protection of workers in the public.

15 So, it kind of just gives you a general  
16 overview of the scope of the programs in the fuels,  
17 and chemistry department. And then the next slide is  
18 just an organization chart, so a lot of the names, and  
19 a lot of the staff that introduced themselves are on  
20 this, but again, gives you kind of an overview of the  
21 different programs, and the different technical areas  
22 that are covered by fuels, and chemistry.

23 So, yeah, just a very brief introduction.  
24 So, are there any questions on any of that?

25 CHAIR BALLINGER: Go ahead then.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. WELLS: Okay, so Hattice, if you want  
2 to bring up David Perkins' slides, we'll turn it over  
3 to David Perkins. Well, I guess we do have the  
4 agenda, so the morning will cover the one chemistry  
5 topic we have with potassium hydroxide. A lot of the  
6 reading materials were papers on the potassium  
7 hydroxide effort. We did develop the agenda kind of  
8 targeted on the fuels side of the house based on  
9 feedback.

10 But there is, we do cover radiation  
11 safety, and in the potassium hydroxide work there is  
12 some changes relative to, for examples, potassium-40,  
13 which will now be generated in the reactor, we're  
14 transitioning that chemistry control regime. So,  
15 we'll give you an overview of the general scope of the  
16 work we're doing in potassium hydroxide, and then  
17 focus on the radiation safety side of the work we're  
18 doing for the rest of that presentation.

19 The rest of the morning is focused on the  
20 nuclear research side of the house -- sorry, fuel  
21 research side of the house, with a number of different  
22 topics. Again, focusing on opportunities where we  
23 thought the activities that we're undertaking may be  
24 of interest, maybe something you encounter in the  
25 future. We would appreciate any feedback you have in

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the scope, and some of the work we have going on for  
2 us to consider as we go forward, and continue these  
3 efforts.

4 MEMBER REMPE: So, Member Ballinger, just  
5 briefly, I've been trying to break in, and figure out  
6 a good time to say this, but as I was preparing for  
7 this interaction, I noticed that there are some  
8 aspects of the presentation where I will need to limit  
9 my comments because of potential conflict of interest  
10 issues. Okay, thank you.

11 CHAIR BALLINGER: Okay, let's go.

12 MR. WELLS: All right, so David, we'll  
13 turn it over to you, and if you just tell us to  
14 advance, we'll advance the slides over here.

15 MR. PERKINS: Sounds good, thank you Dan.  
16 Good morning everyone, we already introduced  
17 ourselves, but my name is David Perkins, technical  
18 executive with EPRI. A little bit more on the  
19 background, I am familiar with this, I was a chemistry  
20 manager at a PWR, so I got the chemistry, and the  
21 radiation safety background. I do apologize, I'm not  
22 there today.

23 We're on site this week at Sequoia for the  
24 demonstration project related to potassium hydroxide,  
25 and we're having meetings as we're working our way

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 through the different aspects of that. I'd also like  
2 to introduce Keith Fruzzetti, Dr. Fruzzetti is the  
3 overall potassium hydroxide project manager. He has  
4 put together a very good team of experts in the  
5 industry, working through the different issues so we  
6 can have a successful demonstration.

7 Next slide please, Dan. So, the biggest  
8 question that we get a lot of times is why potassium  
9 hydroxide, why are we making a change from lithium  
10 hydroxide? In 2013, Government Accountability Office  
11 raised questions about the lithium supply chain. That  
12 is driven predominantly because enriched lithium-7,  
13 which we use in pressurized water reactors for primary  
14 PH control is made in two countries, China, and  
15 Russia.

16 So, if one of those countries had a  
17 maintenance outage, or they had something that  
18 restricted that supply chain, we've got to have the  
19 ability to add to get the PH right for us to start up.  
20 But then on the other side is, we're also starting to  
21 see a demand challenge. Units are starting to go into  
22 flexible operations, we have new pressurized water  
23 reactors coming online, that's going to increase the  
24 demand.

25 And even molten salt reactors as we move

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 forward in these next generation reactors. So, you  
2 have a supply chain challenge, and we've got an  
3 increased demand which was driving the industry, is  
4 there an alternate that we can use?

5 MEMBER MARCH-LEUBA: And Dave, this is  
6 Jose March-Leuba, how many kilos of lithium-7 do the  
7 power plants in the U.S. use a year, grams,  
8 micrograms, kilos, tons?

9 MR. PERKINS: How many kilos? So to start  
10 up one unit, and remember, most of these units are on  
11 18 month fuel cycles, so I'd have to get you more  
12 details. But to start up one unit can be anywhere  
13 from five to seven kilograms.

14 MEMBER MARCH-LEUBA: Each unit?

15 MR. PERKINS: Yes.

16 MEMBER MARCH-LEUBA: So, it's significant.

17 MR. PERKINS: Yes, sir.

18 MEMBER MARCH-LEUBA: And on top of this  
19 table we probably have half a kilo of lithium-7 right  
20 here, so it's not that the material is not abundant,  
21 it's the enrichment from 92 to whatever you need it to  
22 be?

23 MR. PERKINS: Correct. The catch is the  
24 enrichment progress. The lithium-6 can create  
25 significant tritium issues, the reaction is going to

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 go on in the coolant. So, we enrich the lithium-7  
2 contribution to it to minimize that effect, and that's  
3 the challenge. We do not have the capability of doing  
4 that enrichment process.

5 MEMBER MARCH-LEUBA: And out of curiosity,  
6 because I mean we get proposals with lithium all the  
7 time, is it very expensive to enrich it from 92  
8 percent, which is the natural -- natural lithium has  
9 92 percent natural -- is it expensive to get it to  
10 99.X?

11 MR. PERKINS: It's very expensive, and  
12 also the process that is used to make that enrichment,  
13 it's a mercury based process. So, there's not just an  
14 overall expense, but even the process itself creates  
15 some unique challenges.

16 MEMBER MARCH-LEUBA: Okay, thank you.

17 MR. PERKINS: We talked about this, when  
18 we were looking at it, it was brought up, cost  
19 already. So, there is the potential when we shift from  
20 this enriched lithium-7 to potassium hydroxide, these  
21 units can save a significant amount of money because  
22 of the cost of the lithium-7. And then when we step  
23 back even farther though, and we say the other  
24 benefits, there is the definite potential from a fuel  
25 perspective with lower corrosion.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And also when we're looking at mitigation  
2 strategies related to the crud induced power shifts  
3 that the industry has observed in the past. If you  
4 step back even farther, and we say okay, where has KOH  
5 been, it hasn't been applied. KOH has actually been  
6 applied in the VDRs since the beginning. It has been  
7 successfully applied for decades, and we've been able  
8 to leverage that operating experience, as well as part  
9 of this project to get us moving forward into it.

10           And they've helped us significantly on  
11 that, next slide, Dan. So, big picture on the  
12 program, there's four key areas that we're looking at  
13 on this, materials, fuels, chemistry, and radiation  
14 safety. We're not going to get into the materials,  
15 and fuel testing, but you can see we're looking at  
16 initiation, crack growth testing, we're doing some  
17 loop testing for the fuel side of the house.

18           Those tests are ongoing, they're scheduled  
19 to finish up later this year. Today we're going to  
20 talk a little bit about the chemistry, and give you,  
21 really the update on the radiation path on there. All  
22 of this is being managed through the station, Sequoia  
23 station, and actions, or activities are being tracked  
24 through their corrective action program, and the team  
25 is working through the 10 CFR 50.59 evaluation

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 process.

2 Again, we've got to finish the testing on  
3 the materials, and fuels side of the house, and we can  
4 start rolling forward into 2024. Next slide please.

5 CHAIR BALLINGER: So, this is Ron  
6 Ballinger, I'll display my ignorance, but do you folks  
7 think that you'll be able to do this through 50.59, or  
8 will it require a license amendment?

9 MR. PERKINS: Well, that's -- the station  
10 is working through that process now, and according to  
11 the discussions yesterday, they said they still have  
12 to work through the 50.59 process, and then they'll  
13 see if they have to go through the license amendment  
14 as we get into it some more, so that's to be  
15 determined in the future.

16 CHAIR BALLINGER: Thank you.

17 MR. PERKINS: Next slide please. All  
18 right, so when you look at this from the chemistry  
19 radiation safety aspects, there's a couple key points  
20 here, before we get really into details on this. The  
21 chemistry space itself, because it's been used in the  
22 VDR fleet, we've got a lot of operating experience of  
23 how to operate these systems, how to manage the resin  
24 beds, whether it's a cation bed for day to day  
25 operations, we do have a lot of experience there.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           We also have some experience on what the  
2 observations were related to impurities from the  
3 chemistry side of the house too, from these plants.  
4 And regularly we can model this with tools that we  
5 have within the EPRI space, looking at the high  
6 temperature calculations in there. Radiation safety  
7 has been, I won't say more challenging.

8           But it's a little bit more in that we've  
9 got to look at we are introducing potassium hydroxide  
10 into the coolant. That results in the potential  
11 activation, and production of several radioisotopes,  
12 and with that comes into considerations about  
13 instrumentation, radiation fuel changes, dose to the  
14 worker, effluent release pathways, waste streams,  
15 waste processing.

16           So, there are several aspects that we're  
17 working our way through with the plant, and we'll talk  
18 a little bit about them as we go forward. Again, the  
19 main assessments have been completed from the EPRI  
20 side of the house, and now we're working with the  
21 plant to get through, and help them with their day to  
22 day management programs. Next slide please. These  
23 are the six key areas just for you.

24           We talked a little bit about them, but if  
25 you see in there where the numbers are in parenthesis,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 those are EPRI reports, where the assessments have  
2 been completed, and documented on there. Big  
3 experience on this radioisotopic one, which is where  
4 we're going to talk to you, there's no significant  
5 issues, we just have to work our way through the  
6 process on different radioisotopes, and the impact on  
7 the fields on there.

8 Dan mentioned Potassium-40, there are  
9 several other radionuclides, potassium-40 to argon,  
10 chlorine-36 that come into play in there. So, we do  
11 have to step back on that, and look at this from how  
12 the site manages this. The vendor reviews are  
13 completed, phase two of Westinghouse review is  
14 completed, and documented in the report 0959. And  
15 again, the plant demonstration.

16 We're looking at trying to get this plant  
17 demonstration started next year with Sequoia. It will  
18 be three cycles, each part of the cycle from the  
19 chemistry radiation safety aspects we have baseline  
20 monitoring that we'll evaluate for changes as it goes  
21 forward. And again, as of today, right now, we do not  
22 see on the chemistry radiation safety side of the  
23 house, any significant challenges moving forward.

24 CHAIR BALLINGER: This is Ron Ballinger  
25 again, are these EPRI reports public?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. PERKINS: Dan, I would have to look,  
2 I don't know --

3 MR. WELLS: They're not public. We did  
4 provide -- the references that are public are the ones  
5 that we provided in the reading materials.

6 CHAIR BALLINGER: But for purposes of any  
7 submittal to the NRC, these reports would be  
8 available?

9 MR. WELLS: So, we have relationships with  
10 the funders of EPRI, so if they need materials to  
11 submit to the regulator, they can submit them. But  
12 again, I think the indications are all that we do  
13 expect we'll be able to process this, and the site  
14 will be able to process it through a 50.59 evaluation,  
15 and then that would negate that need.

16 CHAIR BALLINGER: Okay, thanks.

17 MR. PERKINS: Okay, next slide. So,  
18 chemistry control, one of the things that we've talked  
19 about, and we had pretty significant discussions on  
20 this. Right now, we normally have just lithium  
21 hydroxide in the system. Lithium is working in that  
22 from an alkaline chemistry perspective on the PH  
23 program. When you look at potassium, and lithium from  
24 an equivalent standpoint, it's about a one to one.

25 So, from a management standpoint, as far

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 as the beds go, and the operations of the beds, it's  
2 a manageable condition, and operations on there,  
3 obviously that they will have to take some procedure  
4 changes, and address them on the procedure, but  
5 chemically it's -- we don't see a major challenge  
6 there. Now, one of the things on this though, is we  
7 still will be producing lithium.

8 Boron-10 neutron reaction will still  
9 produce lithium, this is why they're going to have to  
10 manage both potassium, and lithium controls. So,  
11 they're working on this not only from a technical  
12 aspects, but from human performance aspects in how  
13 they're going to manage both of these potassium, and  
14 lithium to maintain PH control of the plant. It does  
15 require some additional monitoring from the station.

16 They're looking at the capabilities, their  
17 existing instrumentation, they'll actually be  
18 monitoring now, potassium, and sodium to really look,  
19 and evaluate, and track, and trend the system  
20 performance. Resin management, we don't see an issue  
21 with the resin management. Resin management we've  
22 talked a little bit about on there. The biggest  
23 question on there was -- that we've had so far, is  
24 dealing with the caddine resin.

25 And the impacts with now, potassium, and

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 lithium is they're going to create an issue where we  
2 need to make potassium additions, compared to when we  
3 put the caddine bed in service. Do not think that's  
4 going to be the case, because as the lithium builds  
5 up, we'll reach a point in the cycle where lithium  
6 will actually be aiding us, and helping us more with  
7 this PH control program.

8           Connectivities from an analysis  
9 standpoint, again, looking at a human performance  
10 aspect on this part, technicians in the field, the  
11 technicians when they take a sample, and they're doing  
12 some of these samples, they are going to see  
13 differences, especially in the connectivity. In the  
14 connectivity space they use this as an indicator for  
15 potential impurity, or changes.

16           There's going to be some changes on that,  
17 we're working through that, identifying that with the  
18 station, the different analysis, and the potential  
19 impacts on there. So, key thing on here is the  
20 control, using both potassium, and lithium, if you  
21 look at it from about a one to one equivalent, it's  
22 equivalent to lithium only.

23           So, we think from that side of the  
24 technical aspects side of the house, we're done. Now  
25 we're addressing the human performance side as well.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 So, next slide please. We've got six radionuclides  
2 that we're concerned with. Argon-39, argon-42,  
3 chlorine-36, potassium-40, phosphorus-33, sulfur-35.  
4 Now, if you look at the total activity in the coolant,  
5 it's less than 0.1 percent of the total activity.

6 So, in most cases this is not even going  
7 to be an issue as far as the total activity in the  
8 plant goes, it's such a small fraction. What we're  
9 looking at, and working with the station RP staff is  
10 the potassium 40 issue. What's the impact on whole  
11 body counting, other monitors, whether it's a gamma  
12 spec system, we're looking at the effluence, waste  
13 disposal, and dose impacts.

14 MEMBER MARCH-LEUBA: This is Jose again.

15 MR. PERKINS: Yes.

16 MEMBER MARCH-LEUBA: Most of the activity  
17 is nitrogen-16, that has a very short lifetime, is  
18 there a long term issue with activity?

19 MR. PERKINS: Yes, your correct,  
20 nitrogen-16 in the PWR is one of the largest  
21 contributors. What has calculated from the model is  
22 potassium-42 has the potential to be a significant  
23 contributor. Potassium-42 is a very short lived  
24 radionuclide, so that would not be more of a long term  
25 effect. So, we're having to look at this both in that

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 short term effect on the activities potentially from  
2 the potassium-42.

3 Potassium-40, you brought that up, is  
4 there an impact that we see differently from a whole  
5 body monitoring, and that's what we're having to work  
6 our way through. We don't think there's a long term  
7 impact, especially in the waste streams, and waste  
8 effluence. Most of the waste streams are already  
9 analyzing, if you get your results back, it has  
10 potassium-40 identified in it. So, I don't think it's  
11 a long term issue there.

12 MEMBER MARCH-LEUBA: Yeah, the purpose of  
13 my question was to figure out if you guys are thinking  
14 about it, I don't want to know the answer, it's -- you  
15 have to think one millisecond, and two years after.

16 MR. PERKINS: Yeah, correct, yes.

17 MEMBER SUNSERI: This is Matt Sunseri,  
18 I've got another question on this slide. So,  
19 regarding the coolant activity, and these residual  
20 amounts, or these minimal amounts, have you looked at  
21 the impact of the -- I'll call it the post crud burst  
22 cleanup activity levels, I mean would there be any --  
23 .1 of the total pre-crud burst would be one thing, but  
24 .1 after might be a bigger number.

25 MR. PERKINS: Yeah, so when you look at

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 this, Matt, and good to hear from you, the issue on  
2 the crud burst, you're dominated by activated  
3 corrosion products. That is cobalt-58, cobalt-60s,  
4 when you look at that release, this is even a smaller  
5 fraction. And then when we clean up that activity,  
6 we're still going to be a very low fraction of that  
7 activity.

8 MEMBER SUNSERI: All right, thank you.

9 MR. PERKINS: Next slide please. So,  
10 here's the key things, Jose, I think this will start  
11 answering some of your questions on here. What the  
12 station did is they asked a series of questions  
13 related to day to day programs for the RP side of the  
14 house. And we worked with the industry subject matter  
15 expert, and we developed a white paper on this. These  
16 are the key areas that we've looked at, as far as in  
17 this white paper.

18 The item in green up at the top right,  
19 radionuclides of concern, those were identified in the  
20 EPRI report. Items that have kind of a gradient  
21 green, those are the ones they're actively working on  
22 right now, today in the station it's being tracked in  
23 there. It's not just long term rad waste, but  
24 instrument responses, personnel monitors, we're  
25 looking at this how it's going to impact them today,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 and potentially in the future all the way up through  
2 the rad waste, and effluence perspective.

3 I'll kind of go through a couple of them,  
4 just to give you kind of an idea what the scope is  
5 here. Next slide please. Radionuclides, we talked  
6 about this, the radionuclides, you can kind of see in  
7 the image on the left, there is a significant number  
8 of radionuclides that are potentially produced at some  
9 level. Most of them are very short lived, we have the  
10 six that are greater than 24 hours, but most of these  
11 are very short lived.

12 But they will have an impact on day to day  
13 operations, the gamma spec libraries, the whole body  
14 counters, they're going to have an impact on  
15 potentially what we see on baseline monitoring for  
16 these systems. Now that you have new radionuclides,  
17 we're looking at the reactor coolant systems, the  
18 filters, core filtration, cleanup resins. Evaluating  
19 trying to look at if you've got a liquid discharge, or  
20 a gaseous discharge, what's going to potentially  
21 change on that one.

22 And we started this with a baseline  
23 monitoring program looking at getting these samples  
24 beginning of the cycle, middle of the cycle, end of  
25 the cycle, and now we can compare them as we move

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 forward. Next slide. I talked about the baseline, so  
2 here's kind of a bigger picture of that. We focused  
3 on five areas, so I think it was Jose that asked a  
4 question on there.

5 We started with sampling, source term, rad  
6 waste, worker dose, and surveys. Under each one of  
7 those areas, we've got a look at today on the  
8 baseline, and then as we move forward through the  
9 demonstration, looking at the longer term  
10 considerations, as well as monitoring for these  
11 changes. Whether it's a chemistry sampling program,  
12 whether it's a radiation fuel changes through cadmium  
13 zinc telluride technology.

14 Whether it's waste changes, what's going  
15 on with the Part 61 analysis, or what potentially  
16 could be changing in the Part 61 analysis.  
17 Ultimately, we've got to get back to is this having an  
18 impact on the worker? Are we seeing a difference in  
19 the dose? Based on the BWR fleet, they do not see any  
20 differences specifically from these radionuclides,  
21 including potassium-40, but we've got to document, and  
22 understand those effects.

23 MEMBER HALNON: And this is Greg Halnon,  
24 quick question. Do these five areas encompass the  
25 technology, or the systems required for injection, and

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 storage of the chemical on site?

2 MR. PERKINS: You're talking about like  
3 the chemical add system in the system, or are you --

4 MEMBER HALNON: Yeah, I mean there's  
5 modifications required, is there any additional  
6 hazards storing this on site?

7 MR. PERKINS: No. We will use the same  
8 chem add system that they use to add lithium  
9 hydroxide. The storage, and handling requirements  
10 will be consistent with lithium hydroxide as well.

11 MEMBER HALNON: Thank you.

12 MR. PERKINS: Next slide please. So,  
13 instrument -- went too far, one too far, back. Okay,  
14 real quick, on the instrument -- I know we're starting  
15 to run out of time here, don't want to get behind on  
16 the first presentation, but instruments we do have to  
17 look at, and we have now with these radionuclides, we  
18 have different energy responses that these systems may  
19 be exposed to, or this equipment may be exposed to.

20 Now, the good thing like with the  
21 portamonitor, portamonitors actually have a  
22 chlorine-36 efficiency rating to them. So, from that  
23 perspective, we're able to actually bring some of  
24 these harder to detect, more infrequent radionuclides,  
25 and we're able to say yes, these monitors do work.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 So, the plant station staff is going through each of  
2 their instruments, whether it's a tool equipment  
3 monitor, a small article monitor, or a portamonitor.

4 And they're reviewing that based on the  
5 energy spectrum differences that we may be seeing in  
6 there.

7 CHAIR BALLINGER: This is Ron Ballinger  
8 again, can I get a little bit of perspective? What  
9 kind of dose are we actually talking here? If a  
10 worker brings a banana to work, the content of  
11 potassium-40 in that banana gives them, I don't know,  
12 .01 millirem just by eating the banana. What are we  
13 talking about here?

14 MR. PERKINS: Right. So, potassium-40 is  
15 not such at issue. When we're talking about dose, and  
16 we're talking about dose rates, the ones that we're  
17 more worried about to the worker from a day to day  
18 perspective is impacts like potassium-42, because of  
19 the amount of activity in some of these shorter lived,  
20 which is what we're monitoring for. Potassium-40  
21 dose, you're absolutely correct on that.

22 CHAIR BALLINGER: Okay, thanks.

23 MR. PERKINS: Yes. Next slide please.  
24 So, just real quick, before we go into it, we're  
25 trying to -- I shouldn't say everything, we're trying

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 to capture the things from basic gamma spectroscopy  
2 libraries up through bio assay programs. With the  
3 introduction of some of these new potassium hydroxide,  
4 and those six longer lived, does that, or how would  
5 the bio assay programs have to change?

6 They're currently working with the vendor  
7 now to make sure the bioassay program can detect some  
8 of these longer lived radionuclides. And on  
9 potassium-40, you're right, they already can detect  
10 it, and that's a normal part of the body, we have it  
11 in our bodies every day. So, they're looking at like  
12 chlorine-36, and some of the other isotopes in the  
13 bioassay program.

14 Next slide please. So, real quick, kind  
15 wrapping it up, right now we're in the middle, they're  
16 working on the 50.59 process as we talked about. They  
17 are expecting that to complete by the end of the year,  
18 and as long as we can get through the 50.59 process,  
19 that would roll into the engineering change package to  
20 support a fall 2024 start, or injection. Going kind  
21 of refresher on this, we are holding in person  
22 meetings this week on site.

23 We do have regular conference calls with  
24 them in the chemistry, and radiation protection area.  
25 Those areas deal with anything from human performance,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 plant operations, up through equipment monitoring, and  
2 sensitivities. And with that, I think that's the last  
3 slide. Is there any other questions? Yes.

4 MEMBER MARCH-LEUBA: Yes, not a question,  
5 but a comment. You know, when you submit things to  
6 this building, to NRC, the staff has to follow the  
7 regulations to the last semicolon.

8 MR. PERKINS: Correct.

9 MEMBER MARCH-LEUBA: ACRS, we're allowed  
10 to think outside the box. I'm thinking right here,  
11 the banana comment, are we overdoing this? I mean,  
12 are you over killing it? In 1960, we'd have just gone  
13 to a reactor, and dumped some sodium hydroxide, or  
14 sorry, potassium, and see what happens. I mean, you  
15 do some scope, and calculation, you run, and see that  
16 it's not a real serious problem.

17 But we are in an area which we're supposed  
18 to be a modern risk informed regulator, you risk  
19 inform this, and say let's just put it on, and see  
20 what happens.

21 MR. PERKINS: So, how can I say this? I  
22 agree, we have minimal risk that we see on these from  
23 the chemical radiation safety side of the house. I do  
24 think we do need to finish the material, and the fuel  
25 testing though, before we can say, and just inject

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 something. I think we really have to finish that  
2 testing first. The chemistry radiation safety aspects  
3 of this are manageable, they're well documented from  
4 the VDR side.

5 We're just addressing those as they come  
6 forward, but again, I focus the material, and fuel  
7 side of the house, we need to finish that testing.

8 MR. WELLS: I would, if I can, Ron, just  
9 add to that. When we started this effort back a  
10 number of years now, we did evaluate what is the kind  
11 of baseline testing that's required to move, versus  
12 answering all of the materials, and fuels questions.  
13 So, I think from the beginning, our testing matrix,  
14 which a lot of that is outlined in the reading  
15 materials, we're not testing everything.

16 We tried to identify what are the most  
17 limiting materials, what are the materials, whether  
18 it's fuels, or primary system materials that are  
19 different from the VDRs that we can't point to that  
20 experience, and bring that into this fleet. The NSSS  
21 reviews did identify a couple of materials that we  
22 need to add to that, but we have on the testing side  
23 said what is the required?

24 We don't have to do everything, the rest  
25 of it can come over time once we transition.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1                   MEMBER MARCH-LEUBA: Yeah, but I'm pretty  
2                   sure for the last year we have not been importing any  
3                   lithium from Russia, and the political situation with  
4                   China is very questionable. So, if I was a manager,  
5                   and was running my plant, I would like you to speed up  
6                   on getting me potassium, or getting me 100 kilos of --  
7                   a strategic stockpile.

8                   MR. WELLS: And there is strategic  
9                   stockpile within the DOE, it's not very clean --

10                  MEMBER MARCH-LEUBA: Very small.

11                  MR. WELLS: It's not very clean material,  
12                  it --

13                  CHAIR BALLINGER: It doesn't have to be  
14                  clean in there.

15                  MR. WELLS: In 2015 we went through this,  
16                  so the shortage we saw in 2015 was associated with  
17                  production going down. Basically all of the Chinese  
18                  production went away, and the only remaining  
19                  production was coming from Russia, which is not  
20                  supplied predominantly to the U.S., so we did see  
21                  that, and had lots of discussions with where is the  
22                  stockpile, who has it?

23                  Our understanding is that most utilities  
24                  have now a cycle, or two in reserve at the site after  
25                  what happened in 2015.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1                   MEMBER MARCH-LEUBA: It used to be Y-12 in  
2 Oak Ridge was the production facility for lithium, and  
3 I live in Oak Ridge, we used to spend oodles of money  
4 cleaning all the mercury, and still there. So, they  
5 don't want to run it anymore. I think they're  
6 forbidden by law from doing it.

7                   MR. BLEY: This is Dennis Bley. I kind of  
8 agree with Jose on whether we're over killing this,  
9 but you seem to be relying a lot on the VDR data. Why  
10 do you have much confidence in the data you get out of  
11 the Russian system? I've run into problems with how  
12 things are reported over there over the years, and  
13 it's a political process as much as a scientific one.

14                  MR. PERKINS: So, and Dan, you can jump in  
15 on this as well. But here's the thing, we have  
16 members that are in Czech Republic at Temelin, we have  
17 members that are in Hungary at Paks. We have very  
18 good working relationships with them, and they have  
19 provided this VDR information. We have not relied on  
20 the Russian VDR fleet itself.

21                  MR. BLEY: That's much better, thank you.

22                  MR. PERKINS: Yes.

23                  CHAIR BALLINGER: This is Ron Ballinger  
24 again, I need to make a comment that was made  
25 yesterday. While we on this committee think outside

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the box, what you're hearing is our own opinions. We  
2 only speak through letters, if it comes to that,  
3 that's the only formal thing that we have, thanks.

4 MEMBER SUNSERI: Dave, this is Matt, one  
5 more question. You went through this really fast, and  
6 you may have said it, I might have missed it, but are  
7 there any what I'll call adverse side effects from  
8 creating this product, like the enriched lithium with  
9 mercury?

10 MR. PERKINS: No, sir, potassium-40 is  
11 readily available, and it is very easy to manufacture,  
12 so we don't see any side effects from that.

13 MEMBER SUNSERI: And that the purity level  
14 that you need for?

15 MR. PERKINS: We're working through it  
16 right now. The manufacturers today, based off the  
17 feedback we've gotten, again from Czech Republic, and  
18 Hungary, is that they've been able to meet all of the  
19 more restrictive purity levels.

20 MEMBER SUNSERI: Okay, so we don't have  
21 the down side of the enriching --

22 MR. PERKINS: No.

23 MEMBER SUNSERI: All right, thanks.

24 MR. PERKINS: We're going to monitor for  
25 it as we go through it, and also they all have their

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 materials specifications, but we don't anticipate a  
2 problem there.

3 MEMBER SUNSERI: Perfect, thank you.

4 CHAIR BALLINGER: This is Ron for one last  
5 question. It sort of begs the question why are we  
6 using lithium to start with? Is there somebody here  
7 that's old enough to remember?

8 MR. WELLS: We have yet to find the answer  
9 to that question. The only easy answer is it's  
10 simpler chemistry control, because you're only  
11 managing one alkaline.

12 MEMBER MARCH-LEUBA: It was a cheap  
13 byproduct, they didn't know what to do with it. I'm  
14 serious, they were depending on the market.

15 CHAIR BALLINGER: Okay, thanks.

16 MR. WELLS: Thank you, David.

17 MR. PERKINS: Thank you.

18 MR. WELLS: Okay, so we'll transition  
19 topics. The next set of topics are all in our fuel  
20 reliability, nuclear fuels area. So, we'll start off  
21 with a review of the program, and then step through  
22 some specific topics that may be of interest.

23 CHAIR BALLINGER: So far that -- you've  
24 got to get it as close as you can.

25 MS. KUCUK: I'll try.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1                   MEMBER MARCH-LEUBA: Basically you have to  
2 hear the feedback from the room. If you can hear  
3 yourself from the ceiling, you're doing good.

4                   MS. KUCUK: Okay, is that good? Okay,  
5 awesome, great. So, I think I introduced myself  
6 earlier, but again, my name is Aylin Kucuk, I am the  
7 program manager of the nuclear fuels at EPRI. I will  
8 mainly talk about the fuel reliability program. We do  
9 have another program called NFIR, we are going to  
10 mention it.

11                   But since a majority of our work is related to  
12 ATF high burn up, and high enrichment, within fuel  
13 reliability program I will mainly talk about that  
14 program. So, in this fuel reliability program we have  
15 three main objectives. The first one is to support  
16 current operating fleet to minimize, and avoid fuel  
17 failures, and fuel performance issues.

18                   So, we may need to develop an updated fuel  
19 reliability guidelines, tools, and handbooks. We also  
20 inform industry for the operating experiences with the  
21 -- we're supporting them for the change management.  
22 We collect old operating experiences, and response to  
23 those experiences, and we provide the necessary  
24 guidance, how to react, and give them some specific  
25 guidance through those documents.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           So, we also perform research to capture  
2 constant operational efficiencies. There are so many  
3 varieties of options available that utilities are  
4 looking at. So, some of them are listed in this  
5 slide, I'm not going to go over them. And utilities  
6 are not looking at all of them, but these are kind of  
7 options that appropriate as needed, they are  
8 considering those options.

9           And we are working on developing some  
10 technical bases, and some research to help them on  
11 their decision making. So, the third area is the  
12 developing technical bases for regulatory, and safety  
13 issues. These are -- three things are on the table  
14 right now, the ATF, high burn up, and LEU+, and FFRD.  
15 And you will hear what we are doing on these areas  
16 later today.

17           But previously LOCA, and RAA were the main  
18 topics that we worked, and performed a variety of  
19 different research to support the technical basis for  
20 those issues in the past. So, a little bit about our  
21 research. So, I'm going to go over very high level  
22 just to give you guys an idea on what this program is  
23 really doing. The first one is PWR crud, and  
24 corrosion area.

25           The main issues are the CIPS, and CILC.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 CIPS is crude induced power shift, and CILC means crud  
2 induced localized corrosion. Those are kind of  
3 potential risks during operation in PWRs, and  
4 especially for high duty PWRs. We have a tool, a  
5 CIPS, and CILC risk assessment tool called BOA. We  
6 mainly perform research on developing the necessary  
7 models within this tool to have a better prediction of  
8 these conditions during core operation.

9 So, you heard about potassium hydroxide  
10 issue. As the fuel reliability program, our  
11 responsibility is to perform the necessary testing to  
12 make sure that potassium hydroxide can be successfully  
13 implemented with no fuel performance issues, and I  
14 think they already mentioned about the type of testing  
15 that we are doing to support that program. And we  
16 also have a PWR fuel crud, and corrosion guidelines.

17 Mainly including the operating  
18 experiences, and previous research related to CIPS,  
19 and CILC issues, and providing necessary guidance to  
20 utilities. Similarly, for BWR crud, and corrosion  
21 area, we do have a similar tool, CORAL, to perform the  
22 crud risk assessment, and as needed, for BWR, crud  
23 issues is not as operational as PWRs. Like CIPS could  
24 be happening, and causing a lot of issues during  
25 operation.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           But for BWRs, it's more of CILC type  
2 issues. So, the CORAL tool is used for if there are  
3 any known water chemistry transients, or some issues  
4 occurring. But we do have a significant amount of  
5 operating experience included in our guidelines, and  
6 very robust guidance, how to do a risk assessment, a  
7 cycle risk assessment to utilities.

8           Advanced fuel technologies area, this is  
9 an area started with the ATF program, started in the  
10 industry. We mainly focus on the fuel reliability,  
11 and performance benefits of ATF, high burn up, and  
12 LEU+. And then as we move forward, as these new  
13 technologies become more robust, and get into an  
14 implementation stage, we are going to update our  
15 guidelines, tools, and handbooks for a safe  
16 implementation, and proper implementation of these  
17 technologies.

18           But in the meantime, we are also  
19 performing research to enable safety, and economic  
20 benefits of these technologies, and you're going to  
21 hear some of that work later today. So, bringing the  
22 failures, that is the main failure mechanism for fuel  
23 today, and it has been like that for a long time. And  
24 what we are doing is really generating guidance, and  
25 training on how to control for material exclusion.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           But we also look at some fuel technologies  
2           that -- you know, how resistant fuel cladding could  
3           be. Like coated cladding that fuel vendors are  
4           developing could be an additional resistance to debris  
5           threading that some utilities are looking at as a more  
6           robust type cladding for debris in these fuel  
7           failures.

8           MEMBER MARCH-LEUBA: Chromium coated, or  
9           something more sophisticated?

10          MS. KUCUK: So, it could be an old -- I  
11          mean, the main known is the chrome coating. There are  
12          some preparatory coatings that BWR vendors are  
13          developing. There are -- we have not done the well  
14          defined testing yet. So, we'll be looking at the  
15          debris resistance of all type of coatings.

16          MEMBER MARCH-LEUBA: Have they tried heat  
17          treatment, hardening?

18          MS. KUCUK: Yes, the goal is to really do  
19          some testing in an ultra cooled with high temperature,  
20          and high pressure condition, and doing the bare within  
21          that environment to simulate the real environment. To  
22          be able to compare bare cladding to the coated  
23          cladding, see if there's any bigger differences  
24          between that.

25          CHAIR BALLINGER: This is Ron Ballinger

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 again, there's a lot of acronyms up there. One  
2 members might not be familiar with is OLNC, which is  
3 online noble chemistry.

4 MS. KUCUK: Thank you for pointing it out,  
5 yes. Is there any other acronym that --

6 MEMBER MARCH-LEUBA: Yes, all of them, but  
7 you don't need to do that.

8 MS. KUCUK: All right.

9 MEMBER KIRCHNER: Aylin, this is Walt  
10 Kirchner, I'm offline in Santa Fe, New Mexico. What  
11 is your dominant interest about your risk assessment  
12 tool? What do you see as the major driver in crud,  
13 and corrosion problems for PWRs, and then BWRs? I  
14 mean what does it correlate mainly with, is it water  
15 chemistry, or is it burn up, or?

16 MS. KUCUK: So, I think both of these  
17 tools really look at the thermohydraulic conditions in  
18 the fuel bundle, and also the crud, for PWRs, coming  
19 from the corrosion of steam generators, generator  
20 tubes that iron, and nickel comes in. And then this  
21 tool really estimates the amount of the corrosion  
22 product release, and then depending on the boiling,  
23 and thermohydraulic conditions in the bundle,  
24 estimates the position of those corrosion products on  
25 the fuel.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And the associated consequences of the  
2 areas that these crud layers could present from a  
3 conductivity --

4           MEMBER KIRCHNER: I see. So, even with  
5 the advanced steam generator tube alloys, that's the  
6 major source of foreign material then that's impacting  
7 the actual fuel clad?

8           MS. KUCUK: The corrosion products like  
9 the new steam generated tubes have much less  
10 corrosion, so it impacts the source of the crud. So,  
11 that's a big benefit to those PWRs, that they have  
12 less crud coming in. But when new steam generators  
13 are replaced until the protective layer is  
14 established, there is a large amount of corrosion  
15 products coming in. So, it all depends on what stage  
16 these new steam generators are, and the material.

17           MEMBER KIRCHNER: So, is there a way to  
18 pre-age the steam generator tubes with the  
19 installation, so that you don't have this source  
20 threatening the actual --

21           MS. KUCUK: You want to take it, Dan?

22           MR. WELLS: So, we have done some work  
23 looking at -- there's a number of different  
24 technologies that have been applied to reduce general  
25 corrosion once the material is put into service. No

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 one has tried it on steam generator tubes yet, we have  
2 done some work over the last couple of years updating  
3 the way the spec has been written so that you could  
4 utilize it.

5 Because the way the spec was written was  
6 a shiny metallic surface, and if you're pre-oxidizing,  
7 you don't have a shiny metallic surface anymore. So,  
8 we've done some work in that area, but it hasn't been  
9 applied yet.

10 MEMBER KIRCHNER: Okay, thank you.

11 CHAIR BALLINGER: I might comment that you  
12 probably ought to be talking with the Navy people if  
13 you haven't already.

14 MEMBER MARCH-LEUBA: Talk to the food  
15 industry people, I mean --

16 MR. WELLS: There's a lot of work that's  
17 been done in that area.

18 MEMBER MARCH-LEUBA: Whenever you put a  
19 new tank of stainless steel on a juice factory, the  
20 first thing you do is oxidate it.

21 MR. WELLS: And there's a lot of work  
22 that's been done on, especially in new plant space,  
23 can you utilize your hot functional testing period in  
24 order to pre-oxidize, and clean up those materials  
25 before you bring the fuel online. There's been a lot

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 of work in that area, but not functional testing, the  
2 data, it's hard to interpret over the long term, what  
3 the benefits were.

4 But new material being inserted, a lot of  
5 the steam generators that were replaced in the U.S.,  
6 the bowls were electropolished to help with that, but  
7 actual pre-oxidation has been limited with  
8 applications.

9 MEMBER MARCH-LEUBA: All you have to do is  
10 fill up the metal with the proper chemical, and let it  
11 there. That's what they do, they just fill up the  
12 pipes until the stuff moves past it. We've used an  
13 amount of time simply because this is an interesting  
14 topic, but on the crud, the issue is a chemical, atom  
15 by atom deposition, or do we have concerns of flakes  
16 coming out that would become a loose part that can  
17 impact?

18 MS. KUCUK: So, mostly for the fuel  
19 failure risk wise, it's more on the how the crud is  
20 deposited, and then how is a heat impact to the  
21 cladding --

22 MEMBER MARCH-LEUBA: Chemically, atom by  
23 atom?

24 MS. KUCUK: Correct. There were some  
25 concerns on the BWR side whether the spallation of

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 crud, as well as the zirconium oxide layer, because  
2 the -- along with the corrosion products, the  
3 cobalt-60 can also deposit, and very high dose type of  
4 crud that you can find especially on BWRs, if it just  
5 falls off, we were concerned about whether that would  
6 distribute those in the system, or not.

7 But it has not been really demonstrated,  
8 and looked at in detail. But that was one of the  
9 considerations. But other than that, I think for  
10 PWRs, that is not the concern.

11 CHAIR BALLINGER: So, let's be -- I guess  
12 clear it up, I think. The major fuel failure path,  
13 mechanism, at least in BWR is debris threading, right?

14 MS. KUCUK: Correct.

15 CHAIR BALLINGER: In PWRs, I'm not sure  
16 what it is, because that's usually much less of a  
17 problem.

18 MS. KUCUK: So, debris failures in PWR are  
19 much less than BWRs, since it's a closed system. But  
20 as of today, when we look at statistics, it is still  
21 the only failure mechanism that is happening.

22 MEMBER MARCH-LEUBA: The primary research,  
23 because we've become so good at the other mechanisms,  
24 and debris, you can only filter it.

25 MS. KUCUK: Correct.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. WELLS: I mean, it's hard to say it's  
2 causal, but if you look at the data for when our  
3 initial guidance on managing crud, and corrosion, and  
4 the risk assessment tools were developed, and the  
5 application of fuel reliability program in general,  
6 you do see many of these mechanisms have dropped to  
7 basically we don't see them anymore, because we're  
8 good at predicting conditions under which you will  
9 find them.

10 And so, we've largely mitigated it. We  
11 still see debris failures in one, or two other types  
12 of mechanisms.

13 MEMBER MARCH-LEUBA: So, going back to  
14 personal opinions of the banana type, this is 00 we're  
15 reaching a little bit like on the wine scoring. If  
16 you buy a wine on the 85, and you buy a 90, maybe an  
17 increase in price is three dollars, and it's a big  
18 change in quality of wine. But if you go from 98 to  
19 99 the difference is 50000 dollars, and you can't see  
20 the difference.

21 So, there's a point in which we reach the  
22 98 score in wines, and maybe we start to over kill.  
23 Personal opinion, right?

24 CHAIR BALLINGER: This is certainly fun.

25 MS. KUCUK: All right, so the other areas

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 that we're working on, the hydrogen, hydrogen impacts  
2 on zirconium. So, we have a kind of funny acronym  
3 since the name of this area is a little long. But we  
4 mainly look at the scientific, or mechanistic  
5 understanding of how hydrogen is picked up by the  
6 cladding. That is a kind of -- a long studied area  
7 that we are trying to improve on, and also trying to  
8 model in how hydrogen is picked up.

9 As well as how hydrogen impacts  
10 operational issues because of hydrides, and so on.  
11 But we try to get as much hydrogen measurements as we  
12 can. It is a costly activity that involves a PIE, but  
13 we do those type of measurements on really unique  
14 cases just to expand our database, and everything.  
15 For guidance methods, and tools, we have a bunch of  
16 other guidelines, documents, handbooks, and databases.

17 The fuel surveillance, and inspection  
18 guidelines just give guidance to utilities on how to  
19 inspect fuel, when to inspect fuel, the frequencies.  
20 It really provides some sort of process systematically  
21 utilities can implement. For non-destructive  
22 evaluation technologies, we develop non-destructive  
23 evaluation technologies for failed fuel  
24 identification, and anomaly identification.

25 Either eddy current, or some visual

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 inspection tools to ease identification of anomalies  
2 on spacers, and row wall, and things like that. But  
3 besides that, we also are developing eddy current  
4 technologies for better measurement of cladding oxide,  
5 and crud thicknesses. And if we can be successful, we  
6 are also targeting to be able to measure hydrogen  
7 cladding in the pool side.

8 So, it has not been demonstrated yet, but  
9 that is still in works. Control components, and  
10 structural components, there are some work going on in  
11 FRP as well, mostly for life time prediction  
12 improvements, and for PWR control rod modeling area.  
13 So, additive manufacturing of fuel components is an  
14 area that is becoming more, and more interested.

15 That especially fuel suppliers are looking  
16 at some really advanced debris filter designs to  
17 screen, or filter out debris, or much smaller, very  
18 light debris as possible. This will be an area that  
19 we'll be probably focusing on in the next several  
20 years.

21 CHAIR BALLINGER: Since we're compiling  
22 banana comments, SHIZAM, by the way, there used to be  
23 a TV show when TV was still black, and white, which is  
24 probably before all of you were born, where there was  
25 an actor, singer who used to use that word as part of

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 his act. And I now forget the person's name, so  
2 anyway, another banana comment.

3 MR. WELLS: I guess while we're taking  
4 banana comments, a lot of this is maintenance of stuff  
5 we've done. Just Jose, to your comment, we are, if  
6 you think back to Aylin's first slides, we are  
7 focusing on some of the newer things that are pushing  
8 into new areas, and not just kind of these are -- a  
9 lot of the previous ones at least, are maintenance of  
10 those products to make sure when things change,  
11 they're still effective, things like that.

12 MEMBER MARCH-LEUBA: Your day time job  
13 should be keeping the operating plants running, it  
14 shouldn't be unsafely. But have to keep a little bit  
15 of one hour a week to think this moon shot, how are we  
16 going to get the silicon carbide cladding, things like  
17 that. But remember what your day time job is.

18 MR. WELLS: Absolutely, thank you.

19 MS. KUCUK: That's exactly what those  
20 slides are mainly for. However, now I'm going to go  
21 into kind of new stuff that are kind of on the table.  
22 But before I go into what EPRI is doing, I just want  
23 to give you guys a kind of overview about what is  
24 going on in the industry related to those new  
25 technologies. For ATF concepts in the U.S., there are

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 some near term, and longer term concepts.

2 For near term concepts, mostly coated  
3 cladding, and for longer term concepts, non-zirc type  
4 cladding like silicon carbide, and iron clad, iron  
5 chrome aluminum type cladding. So, this slide really  
6 highlights, and gives a lot of the details in terms of  
7 who is doing what, and what type of technologies. For  
8 PWR, mostly focusing on chrome coating on their base  
9 cladding material, depending on the supplier.

10 For BWRs, there are only two different  
11 kind of preparatory coating, and Framatome, and GE  
12 have been working on, and GE is also working iron  
13 chrome aluminum type cladding. This is the kind of  
14 technology between near term, and long term. It's not  
15 really long term, but it's sooner than the long term  
16 type technology. In the long term the only material  
17 is silicon carbide that only PWRs are looking at.

18 For fuel, the U2 is already approved by  
19 NRC that Framatome, and Westinghouse has developed.  
20 But Westinghouse is also looking at uranium nitrate  
21 type fuel, which has some leads already in reactor.  
22 And fore burn out, all suppliers are looking at burn  
23 up up to 75 with LEU+. So, this is on the development  
24 side. And then going into the LUAs, or lead fuel, or  
25 test rods, this is a slide that NEI prepared.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And it's up to date as of right now, the  
2 variety of different options are under irradiation  
3 since 2018. And some of these test rods were already  
4 completed at least one cycle, and some of them already  
5 shipped to a head cell for PIE, and then the further  
6 irradiation for a bunch of them are ongoing. Those  
7 variations are coated cladding, and an iron clad, iron  
8 chrome aluminum is being irradiated in two different  
9 reactors.

10           And different variety of fuel add pellets,  
11 as well as uranium nitrate type high density fuel.  
12 And with two different high burn up LUAs are ongoing.  
13 And with LEU+, I think that's the -- Vogtle is the  
14 only one, LEU+, and high burn up, and coated cladding  
15 all together, that will likely start in early 2024.  
16 So, this is a kind of very easy chart with a lot of  
17 colors, and a lot of shapes.

18           But I try to summarize what's going on in  
19 the industry, and then what is the kind of interest  
20 that utilities are looking at with these new  
21 technologies. So, ATF started with only coated  
22 cladding as a near term technology. The main focus is  
23 the safety benefits, and it has shown that there are  
24 some operational safety benefits, especially with  
25 higher burn up, and enrichment.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           But also severe accident benefits for each  
2 of these technologies, but the benefits could vary  
3 from technology to technology, or whatever condition  
4 is being evaluated. There are some desired fuel  
5 performance benefits that needs to be demonstrated,  
6 but that's the kind of incentive for utilities. Like  
7 I talked about debris resistance.

8           If these coatings can provide some  
9 additional debris resistance to prevent debris fuel  
10 failures, that's a big economical impact, or savings  
11 to utilities. If it can get low corrosion, and  
12 hydrogen pick up, it could really provide -- excuse  
13 me? Okay, all right. If I continue, so, I think the  
14 other benefit we are looking at low corrosion, and  
15 hydrogen pick up.

16           It could really provide some flexibility  
17 to operation, and a lot of simplifications, and also  
18 if it can be demonstrated as robust to whatever  
19 chemistry transience that may happen in reactor, that  
20 could also provide an additional margin to plant  
21 operation. And then the other big benefit, and that's  
22 the one that we're going after the most, is fuel cycle  
23 economics.

24           That's where the high burn up, and high  
25 enrichment piece really comes in. So, PWRs are trying

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 to transition 24 month cycles, right? So, especially  
2 for longer -- I mean high duty PWRs, if the burn up is  
3 extended, and if the higher than five percent  
4 enrichment is allowed, then those high duty PWRs could  
5 go to 24 month cycle. There is a kind of significant  
6 economical benefit in that case.

7 That's the main purpose that high burn up  
8 in LEU+, and FFRD is the main technical challenge,  
9 that's where we are kind of focusing on developing  
10 some technical bases, and looking at different  
11 approaches to address that FFRD issue. And Fred  
12 Smith, and the XLPR team are going to mainly talk  
13 about what is our approach to address FFRD to open up  
14 the path for high burn up licensing.

15 CHAIR BALLINGER: You know that there's a  
16 rule change that's coming down the pipe on high burn  
17 up, and FFRD is explicitly required to be accounted  
18 for.

19 MS. KUCUK: Right, yeah.

20 MEMBER MARCH-LEUBA: We talked about  
21 acronyms before and for the transcript, when you say  
22 that something is really, really important, tell us  
23 what fuel fragmentation and dispersal is?

24 MS. KUCUK: Yes, FFRD means fuel  
25 fragmentation relocation, and dispersal.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER MARCH-LEUBA: So, only when you say  
2 in the transcript this is extremely important, as a  
3 member of the public I'm reading it --

4 MS. KUCUK: Okay.

5 MEMBER MARCH-LEUBA: They don't know what  
6 it is.

7 MS. KUCUK: Good reminder. Any other  
8 questions?

9 MEMBER MARCH-LEUBA: Yes, we are  
10 officially way over time, so I'll shut up.

11 MS. KUCUK: Okay.

12 CHAIR BALLINGER: Not officially way over  
13 time yet.

14 MS. KUCUK: Okay, I'll --

15 CHAIR BALLINGER: But we have a break  
16 scheduled at 10:25, so we're working at it.

17 MS. KUCUK: Okay, maybe I can speed up  
18 here. So, the other pieces, the power up rates that  
19 Inflation Reduction Act really provided some huge  
20 incentives to current operating fleet to do power up  
21 rates. And we're looking at time, and temperature  
22 criteria changes to support the utilities to look at  
23 increased power up rates. So, with that, I think I  
24 have a few slides just to go over in terms of what  
25 EPRI is going.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           Maybe I'll just go over very quickly with  
2 you guys, because some of them the team is going to  
3 talk in depth. So, the high burn up area is one that  
4 alternative licensing strategy, is that what's we're  
5 pursuing to address FFRD, that Fred Smith is going to  
6 talk in detail. And our main goal is really to  
7 resolve this FFRD issue, and open the path for  
8 industry to expand burn up up to 75.

9           Besides the alternative licensing  
10 strategy, there is also some work going on related to  
11 FFRD consequences assessment for large break LOCA, and  
12 fuel suppliers are developing the methodologies, but  
13 EPRI's role is to develop some technical bases for  
14 some of these phenomenon to support them, and also  
15 provide some clarity for those issues.

16           MEMBER MARCH-LEUBA: Any plans for  
17 experimental data to back up your analysis?

18           MS. KUCUK: For alternative licensing  
19 strategy --

20           MEMBER MARCH-LEUBA: For 75 gigawatt FFRD.

21           MS. KUCUK: So, the experimental data  
22 wise, we're doing the -- working with fuel suppliers  
23 to do some hot salt PIE in terms of characterizing the  
24 fuel fairly high burn up for fusion gas release  
25 measurements, and fuel conditions, and so on to

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 support the fuel performance tools implement. We are  
2 also doing some testing, mostly on cladding burst, and  
3 dispersal phenomenon related work.

4 MEMBER MARCH-LEUBA: So, you're using --

5 MS. KUCUK: There are, yes.

6 MEMBER MARCH-LEUBA: Okay, because the  
7 trend is to go 100 percent computational basis, and  
8 you need to validate the basis.

9 MS. KUCUK: There are some also very large  
10 set of LOCA test plan at the treat facility at INL,  
11 and to really -- I mean that is going to be the kind  
12 of main set of data to support the fuel suppliers,  
13 methodologies, and qualification as well.

14 MEMBER MARCH-LEUBA: Thank you.

15 MS. KUCUK: Okay. And we have this CRAFT  
16 framework that Kurshad is going to talk more on that.  
17 We are trying to coordinate those efforts within the  
18 industry through that framework. CRAFT means  
19 collaborative research on advanced fuel technologies.  
20 And then I already talked about this relaxed time, and  
21 temperature criteria that we're working with. And I  
22 think I'll just kick it to Kurshad to talk about it a  
23 little bit more.

24 And then for fuel performance assessment  
25 wise, that's where a majority of our focus is, within

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the fuel reliability program, and we have been doing  
2 a lot of work on this area by doing some laboratory  
3 testing for the presentative chemistry conditions for  
4 both Ps, and Bs looking at testing these materials in  
5 kind of extreme conditions to identify the boundaries,  
6 and limits.

7 We are doing some atomistic modeling of  
8 coating behavior, which you're going to hear more  
9 later today looking at whether chrome coatings could  
10 be a barrier for hydrogen, or not. And developing new  
11 technologies, and I talked about the assessment, and  
12 also the general characterization of fuel to support  
13 the term mechanical model improvements.

14 For safety benefits, for high burn up  
15 safety benefits, I think Fred is going to talk more,  
16 and back end impacts, there are some benefits that  
17 we're seeing there that Bob Hall is going to have a  
18 detailed presentation there. We have done a MAAP  
19 analysis for accident benefits for near term, and long  
20 term of these concepts, and each of these concepts  
21 provides some additional coping time.

22 But depending on the scenarios, and the  
23 material, their coping time results could be  
24 different. But currently we are working on upgrading  
25 the MAAP pool by bench marking the QUENCH-ATF data

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 coming from the OECD-NEA program. And then once the  
2 bench mark is completed, if there is significant  
3 changes in the tool, we may reassess these previous  
4 analysis for the coping time calculations.

5 So, there are some accident source term  
6 guidances coming from NRC that I think there are some  
7 impact to the current fleet, but those changes, or  
8 impacts are not driven by fuel burn up increase at  
9 least so far.

10 MEMBER REMPE: So, before you leave this,  
11 I've seen some of the other prior MAAP updates, and  
12 I'm all for increased enrichment, and higher burn up,  
13 and fuel economies, but one needs to think about that  
14 we don't have accident tolerant control rods. There's  
15 other components in the vessel that oxidize. With  
16 BWRs, there's the channel boxes, stainless steel  
17 components that can produce combustible gas, not just  
18 hydrogen, but other types of combustible gas.

19 And we don't regulate severe accidents,  
20 but one needs to not get too enthusiastic about  
21 accident tolerance of these advanced technology  
22 concepts. And is EPRI thinking about that? Because  
23 you might need to think about what might happen if the  
24 fuel rods stay there when the control rods are there,  
25 and that's more than what, I think MAAP can do.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MS. KUCUK: Right, so there are some work  
2 going on, I believe in Japan, looking at advanced  
3 control rods, accident control rods area. We are  
4 engaged, and monitor their developments, and so on.  
5 And for channels, definitely I think there were some  
6 considerations for silicon carbide channels instead of  
7 zirc channels. I mean, EPRI had done some work on  
8 this area before, but silicon carbide dissolves in  
9 oxidizing environments.

10 So, we need to look at some improved  
11 coatings, and things like that if that would be the  
12 case. But there's not any current activities on this  
13 area, I'm only referring to what was done previously.

14 CHAIR BALLINGER: This is Ron Ballinger,  
15 I'm going to make a semi heretical comment here. I  
16 divide these kind of things into two categories. The  
17 kind that says we need to be alive in the morning, and  
18 that is improved chemistry, improved burn up, improved  
19 things like that. And then the group which I consider  
20 to be hypothetical, and that is accidents that we're  
21 spending a ton of money on to categorize the behavior  
22 in a hypothetical accident.

23 And it makes me wonder whether, or not  
24 applying risk informed, or risk based even techniques  
25 might be a significant advantage. And I'm wondering

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 whether you're doing that anyway, because as far as I  
2 know, the amount of coping time you get, increased  
3 coping time for ATF is within the noise of the  
4 uncertainty on any of these calculations. So, and to  
5 go to 24 month cycles, we hear that people are  
6 thinking about a single batch core in order to do  
7 that.

8 So, I'm wondering whether you're dividing  
9 your work into the first class, and second class,  
10 where there's a risk threshold that you're trying to  
11 apply here. I'm probably not stating it clearly  
12 enough, but you get my point. I mean we're not going  
13 to have another Fukushima in New York City.

14 MS. KUCUK: Right, I think the -- I mean,  
15 if I go back here, not this one. I think a lot of the  
16 effort is really on longer fuel cycles. I think  
17 that's where a lot of the PWRs are focusing on. So,  
18 the comment that you're making, those new  
19 technologies, how they are going to benefit the  
20 current fleet to keep them running, and operating  
21 right now rather than focusing on the very rare severe  
22 accidents, right?

23 So, I think that's where the kind of fuel  
24 performance, and fuel cycle economy, that's where the  
25 utilities are mainly focusing on, or interested with

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 these new technologies. And all these 24 month cycle  
2 core designs they are looking at, and it may vary from  
3 plant to plant, depending on their duty levels, or  
4 what class of plant it is, some of them may already  
5 implement it, and some of them we really need to go to  
6 high burn up to be able to do that.

7 CHAIR BALLINGER: We'll get in this  
8 argument on the FFRD discussion, I'm sure.

9 MS. KUCUK: Yes. That's all I have. Yes,  
10 all right.

11 CHAIR BALLINGER: We are pretty much on  
12 schedule.

13 MR. WELLS: 15. All right, Craig, I think  
14 you're going to present, is that correct? If you want  
15 to come up?

16 MEMBER SUNSERI: By the way, Dr.  
17 Ballinger, the television show you were talking about  
18 is called The Adventures of Captain Marvel, the  
19 protagonist was Billy Batson, and he would yell  
20 shazam, and turn into Captain Marvel.

21 CHAIR BALLINGER: Remember Gomer Pyle?  
22 You do remember, he used to say that. It was kind of  
23 funny, because the man, I forget his name, maybe it  
24 was Gomer Pyle, he had a fantastic singing voice. So,  
25 he had two careers, he had this TV show --

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER SUNSERI: Jim Neighbors.

2 CHAIR BALLINGER: What was it?

3 MEMBER REMPE: Jim Neighbors.

4 CHAIR BALLINGER: I was going to be on a  
5 mission from God to find out his name.

6 (Simultaneous speaking.)

7 CHAIR BALLINGER: On that note.

8 MR. HARRINGTON: On that note we'll switch  
9 gears from more directly fuels issues to XLPR. I'm  
10 Craig Harrington from EPRI's materials reliability  
11 program, and my colleague is on the line, who is not  
12 able to come today. And then Markus will be stepping  
13 in momentarily to handle the back half of this  
14 presentation. Our focus in this work is primarily to  
15 support the fuels alternate licensing strategy.

16 So, we'll be covering materials in that  
17 regard. The outline, I will cover the brief overview  
18 of XLPR, and the work scope, and then Markus will pick  
19 up the last three topics. So, throughout this project  
20 we've found that there are times when piping, and  
21 fuels speak a little bit of a different language.  
22 Sometimes we even use the same words, the same  
23 acronyms in different ways.

24 So, we've created a list of acronyms that  
25 you can refer to. Most I think will be fairly clear,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 and familiar to you, but a couple that maybe not so  
2 much are RVIN, RVON, SGIN, and SGON which are reactor  
3 vessel inlet, outlet nozzles, and steam generator  
4 inlet, and outlet nozzles. We'll be throwing those  
5 terms around quite a bit. So, XLPR was created  
6 jointly between the NRC Office of Nuclear Regulatory  
7 Research, and EPRI over about a decade, or so.

8 Intended to be a state of the art  
9 probabilistic fracture mechanics code, really for  
10 piping applications at this point. The intent behinds  
11 its creation was to provide new quantitative  
12 capabilities to analyze risks associated with nuclear  
13 power plant piping. When we refer to risks in this  
14 particular context, we mean either leakage, or rupture  
15 due to active degradation mechanisms such as fatigue,  
16 and primary water stress corrosion cracking.

17 So, it has an extensive set of modeling  
18 capabilities in addition to the fatigue, and stress  
19 corrosion cracking. A couple in particular worth  
20 noting are ability to address in service inspection,  
21 multiple types of mitigation, calculate leak rates,  
22 and also to consider the seismic effects. This is one  
23 of these.

24 So, XLPR is a probabilistic code, and so  
25 we wanted to point out a few differences between

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 deterministic approaches, and probabilistic  
2 approaches. In a typical fracture mechanics analysis,  
3 we combine inputs including stress, materials  
4 toughness, crack growth rates, and crack size to  
5 determine a component life. In the deterministic  
6 space -- I didn't prepare these, so I didn't realize  
7 that I was going to have to click each time, but  
8 that's good.

9           Focuses everybody's attention in the right  
10 place. So, in the deterministic space, we would  
11 assume a particularly low -- no. We consider  
12 conservative values, high values in stress, low value  
13 in fracture toughness, and also high values for crack  
14 growth, and for an initial crack size. And you  
15 combine all of those to produce one single calculation  
16 that has embedded margins that are, and conservatisms  
17 that are really typically fairly poorly defined at  
18 best.

19           The probabilistic approach though, is a  
20 bit different. We performed numerous calculations,  
21 produced numerous results sets with inputs that are  
22 different for each realization of the problem, and  
23 those inputs are sampled from distributions that  
24 represent each uncertain input. Results are then  
25 aggregated to produce the failure probability over

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 time, determine the best estimate value for each of  
2 the various figures of merit that we are trying to  
3 evaluate.

4 And it gives us the ability to control the  
5 level of conservatism that is included in those  
6 results. XLPR is a probabilistic code, internally it  
7 really just performs a set of deterministic  
8 calculations. But it does so repeatedly. Makes sure  
9 to fully interrogate the problem space. Traditional  
10 --

11 MEMBER DIMITRIJEVIC: Sorry to interrupt  
12 you, but I was curious always, performed sets of  
13 deterministic calculations, is there a certainty  
14 associated with those calculations, those equations  
15 other than just uncertainty in input data? I don't  
16 know, did I make myself clear? Is there multiple  
17 uncertainties considered also?

18 MR. HARRINGTON: Missed part of that.

19 CHAIR BALLINGER: Yeah, for the record,  
20 that's Vesna Dimitrijevic, can you repeat the question  
21 then Vesna?

22 MEMBER DIMITRIJEVIC: Yes, so my question  
23 here is the uncertainty -- the difference which you  
24 explained to us is that we have uncertainty in input  
25 data considering probabilistic approach versus just

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 using the value in deterministic approach,  
2 conservative value. My question is, is there also  
3 uncertainty in the model, in the calculations,  
4 equations connecting those input data considered?

5 MR. HARRINGTON: Yes, there certainly is.  
6 There's uncertainty in the models, there's uncertainty  
7 in the data, so yes, we have to deal with uncertainty  
8 throughout. And in the particular context of XLPR, in  
9 its development, we put a lot of effort into trying  
10 to, as best we could, assess that, evaluate that,  
11 characterize that. So that in the end we have a  
12 reasonable understanding of where those uncertainties  
13 fall.

14 And to what extent we have bias in the  
15 overall code. So, we looked at that for each of the  
16 component modules within the code, and then actually  
17 have a report, an uncertainty report from the  
18 development of the code that looks at those individual  
19 pieces, and rolls that up into an overall  
20 understanding of the degree of uncertainty, and the  
21 degree of bias that is present there. So, yes, it is  
22 an important aspect of this whole problem.

23 MEMBER DIMITRIJEVIC: All right, thanks  
24 for that, that's what I was curious about, thank you.

25 MR. HARRINGTON: Sure. So, traditional

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 deterministic analyses are typically much more  
2 straight forward to perform. But probabilistic  
3 approaches, while more complex, can also be more  
4 informative. So, to shift to the work scope, this is  
5 specific to the support that they're looking for  
6 within the fuels area for the alternate licensing  
7 strategy.

8 We have looked a bit more broadly at the  
9 topics here, but what we'll focus on today is  
10 specifically the fuels area. So, we are attempting to  
11 validate the LOCA frequency estimates that are  
12 published in NUREG-1829. This is a report that's been  
13 out for a decade, or so. NUREG-1829 produced LOCA  
14 frequencies as a function of line size, and it  
15 implemented an expert elicitation process, a very  
16 complex process, I might add.

17 That process also involved probabilistic  
18 fracture mechanics, but in a less direct manner. They  
19 were used to assist in bounding the problem, and in  
20 forming the elicitation process, but it was not a  
21 directly analytical approach, it was an elicitation  
22 approach. XLPR in our case is being used to directly  
23 provide an order of magnitude comparison to our  
24 results, and the 1829 results.

25 In addition, XLPR can provide statistics

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 on the time between detectable leakage, and rupture.  
2 This is essentially a leak before break type of check.  
3 Classical deterministic leak before break analysis  
4 procedures basically just compared leakage, and  
5 rupture flaw sizes, and time is not a factor in the  
6 analysis.

7 With an XLPR, we track crack progression  
8 from initiation through growth to leakage, and  
9 eventually to rupture. So that the time between  
10 critical stages is easily obtained from those results.  
11 The key outputs that we've investigated in this  
12 particular project as it relates to fuel  
13 fragmentation, relocation, and dispersal, FFRD, are  
14 the probability of LOCA.

15 In this case we use rupture as a proxy for  
16 LOCA, and the probability that leakage as a precursor  
17 to rupture will be detected in sufficient time to  
18 shutdown the reactor. Detecting a leak allows the  
19 operators to shutdown prior to the rupture,  
20 eliminating the loads that drive crack progression,  
21 and thus preventing that rupture.

22 Alternatively from a more conservative  
23 ECCS perspective, postulating that despite having  
24 shutdown, the crack does still occur, or the rupture  
25 does still occur, there will be a beneficial plant

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 shutdown, reduction -- or post shutdown reduction in  
2 decay heat levels before that postulated rupture would  
3 occur. So, this is a little bit of an eye test, not  
4 really intended to have to dig in, and read all these  
5 numbers.

6 But line size is a primary attribute of  
7 the analysis scope that we've undertaken. This slide  
8 shows tables 1 on the left, and 3.5 on the right, both  
9 from NUREG-1829. Table one shows the LOCA frequencies  
10 with respect to line size, and it's broken down by  
11 PWRs, and BWRs, we're focused on the PWRs part at this  
12 point. Line 3.5 shows the different systems.

13 They looked at piping both in size, and  
14 various systems, and the kinds of degradation  
15 mechanisms that would be relevant, or those systems  
16 along with other attributes of consequence.  
17 Separately from our work, the ALS team has generated  
18 line size information at which FFRD becomes a concern.  
19 They will cover that in more detail in, I think the  
20 next presentation probably. Fred's shaking his head.

21 But for our presentation, FFRD was  
22 determined to only really be a concern for line sizes  
23 above NPS14. From the NUREG-1829 tables, the only  
24 lines, and not just from their tables, but from what  
25 we know of the plants, the only lines that then are

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 relevant, that are above NPS14 are the reactor coolant  
2 loop piping. So, for our XLPR analysis work that  
3 we'll talk about today, the scope is limited to the  
4 hot leg, the cold leg, and the crossover leg.

5 And it's worth noting that in the  
6 NUREG-1829 analysis, they broadly considered a range  
7 of degradation mechanisms that could be relevant to  
8 the piping involves. XLPR presently only evaluates  
9 explicitly fatigue in primary water stress corrosion  
10 cracking. And in general, PWSCC is limited. So, in  
11 this light, to try to close that gap between the  
12 broader degradation mechanism approach in NUREG-1829,  
13 and the more limited capabilities of XLPR, we referred  
14 to the EPRI materials degradation matrix.

15 Which is really the guidance document that  
16 industry uses to proactively manage materials  
17 degradation issues across the fleet. The materials of  
18 interest here are the 300 series stainless, and alloy  
19 80 to 182, the similar metal welds. So, those, we've  
20 looked at the degradation methods that are included in  
21 the MDM, rigorously identified, assessed.

22 And for the ALS scope of interest, the  
23 broader set of degradation mechanisms covered in  
24 NUREG-1829 are either evaluated explicitly in the case  
25 of fatigue in PWSCC, they are well addressed by other

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 industry guidance such as in the case of thermal  
2 fatigue, or simply are not applicable to the piping  
3 systems that we're dealing with.

4 So, based on that comparison, we have  
5 concluded that XLPR studies that we've performed do  
6 provide valuable insight into the conservatism, or  
7 non-conservatism of the NUREG-1829 LOCA frequencies  
8 despite the differences in degradation mechanism,  
9 scope. So, with that, Markus will pick up, and go  
10 through the details of analysis.

11 CHAIR BALLINGER: This is Ron Ballinger,  
12 before you get up, I have a couple of questions.  
13 XLPR, Dave Rudman is not here, so otherwise he would  
14 be jumping up, and down back there. But XLPR, first  
15 off, initiation is not considered, so the crack has to  
16 exist already --

17 MR. HARRINGTON: No, we do consider  
18 initiation.

19 CHAIR BALLINGER: Okay, I thought that --

20 MR. HARRINGTON: I mean this is really the  
21 first time in analysis space that we've built a code  
22 that does incorporate initiation.

23 CHAIR BALLINGER: Okay, good, that's new  
24 then. The second thing is has anybody done an  
25 analysis where we've compared the XLPR crack

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 progression, and leakage, the crack size results, with  
2 when you hit the unidentified leakage limit in a PWR?  
3 And so, in other words, you propagate until you get  
4 rupture, but rupture is never going to occur we hope,  
5 primarily because of the unidentified leakage limit,  
6 which is there.

7 So, has anybody ever done the analysis of  
8 will we actually have a problem because of the  
9 unidentified leakage limit that would be exceeded long  
10 before we get rupture?

11 MR. HARRINGTON: Yes, all that is very  
12 thorough, in fact Markus will cover a lot of this, but  
13 just a couple points on initiation. We do have  
14 initiation models built in to the code, but we also  
15 have the ability to side step that, and use an initial  
16 flaw size. So, we have both of those capabilities.  
17 Within the code then, we also have leakage evaluation,  
18 leakage results.

19 So, we monitor from the very beginning of  
20 when the pipe crack first goes through a wall, and we  
21 start calculating the leak rate through the wall. So,  
22 we have the progression of leak rate over time. And  
23 in this work we focus a lot of attention on that  
24 progression, so we can -- and Markus will report  
25 results looking at either one GPM, or in leak before

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 break terms, ten GPM is an important number as well.

2 We evaluate both of those numbers, or  
3 other leak rate values that we might choose to look  
4 at. And can therefore easily determine when you would  
5 reach the officially detectable leakage of one GPM  
6 typically in tech specs, as opposed to pipe rupture.  
7 So, in LBD space, you're just looking at crack sizes,  
8 you don't care how long it takes to go from A to B.

9 In our work, both in this project, and in  
10 prior work with the NRC research on leak before break,  
11 we've looked very rigorously at what is that time  
12 between detectable leakage, and rupture, and find most  
13 of the time, not surprisingly, it's a significant  
14 amount of time. So, yes, it's a very important part  
15 of this work, and one that we'll spend a lot of time  
16 on.

17 MEMBER HALNON: Craig, one the one with  
18 the -- some are hot leg crack, did you compare, or  
19 overlay that whole even with what you're doing here,  
20 does it make sense when you set that?

21 MR. HARRINGTON: We certainly made a  
22 significant attempt to do that. It is problematic to  
23 compare a single event to a probabilistic result. But  
24 this -- the code calculates probabilities, and so  
25 those two things -- yeah. Those two things are just

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 hard to reconcile directly. But we did, in the  
2 verification, and validation of the code at the end of  
3 development, we looked at those kinds of events.

4 That one in particular, and others that at  
5 least, obviously we've not had a rupture, so we don't  
6 have that to bench mark against. But as different  
7 precursor events of leakage, and cracks developing,  
8 and things like that. So, we did take a comprehensive  
9 approach at trying to bench mark as best we could  
10 against those kinds of events.

11 CHAIR BALLINGER: Yeah, and we have to be  
12 careful, I'm going to use a little bit more colorful  
13 language, but the VC summer weld was anything but  
14 typical.

15 MEMBER HALNON: It's true.

16 MR. HARRINGTON: And that creates part of  
17 the challenge, because there's a lot of uncertainty  
18 in, in particular the weld residual stresses within  
19 that weld, and --

20 MEMBER HALNON: In the early times during  
21 the root cause, since I was there leading it, we were  
22 concerned about the safety implications relative to a  
23 potential rupture, how much time did we have before  
24 the rupture? And obviously this code didn't exist  
25 then, but it really factored into the regulatory

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 response to it. And that's what I was getting to, is  
2 were we unfounded in our fears, just because of the  
3 potential?

4 Or were we well within our reasonable  
5 sphere of being concerned about the impact of the rest  
6 of the fleet, and potential other welds? I mean we  
7 certainly had the rest of the fleets attention, and I  
8 say fleet as in PWRs, especially the Westinghouse,  
9 attention on it, and that was a concern that may have  
10 caused some unnecessary inspections, shutdowns, other  
11 things.

12 So, that's what I see the value of this  
13 is. When we do come up to the event, we can maybe not  
14 react so emergency, or over react, I guess, not under  
15 react obviously, but certainly not over react.

16 MR. HARRINGTON: I think we maybe did a  
17 better job in not terribly over reacting. In that  
18 case, we struggled a little bit more with your Wolf  
19 Creek thing, but that was a bit more of a dynamic  
20 response by the fleet, or part of the fleet. But  
21 yeah, those were fun times.

22 MEMBER HALNON: You don't have to tell me.

23 MEMBER DIMITRIJEVIC: Hi, this is Vesna  
24 Dimitrijevic again. I just want to clear something,  
25 you already responded to Ron sort of on the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 initiation. So, this is a time step process, right?  
2 So, what is your time zero situation? You have a  
3 certain distribution of the flows in the sizes, right?  
4 That's where you start. What is the situation in time  
5 zero where you start your progression?

6 MR. HARRINGTON: What's the situation at  
7 time zero?

8 MEMBER DIMITRIJEVIC: Yeah, what is  
9 happening -- when you start your progression in time  
10 zero, you have a different flow distribution, right,  
11 size distribution?

12 MR. HARRINGTON: You mean in general with  
13 XLPR --

14 MEMBER DIMITRIJEVIC: Yeah --

15 MR. HARRINGTON: Or for this particular  
16 project? In general the pipe is assumed to be  
17 pristine, and not cracks. The initiation models  
18 within XLPR account for the incubation time for crack  
19 initiation. And then we don't get into the very tiny  
20 details of initiation. When initiation occurs, we  
21 consider it to be a crack of engineering scale that  
22 responds to fracture mechanics kinds of concepts.

23 But we do account for that incubation  
24 time, and then a crack appears, and follows a growth  
25 line. Does that help?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1                   MEMBER DIMITRIJEVIC: So, what you said to  
2 Ron is exactly right, you didn't assume an existence  
3 of the cracks, or flaws, you just used pristine  
4 piping, I see.

5                   MR. HARRINGTON: We can, but if we use the  
6 initiation process, then a bit part of that is to  
7 recognize that cracks typically do take some time to  
8 incubate, and develop before they become meaningful.

9                   MEMBER DIMITRIJEVIC: Right, because in  
10 probabilistic versus deterministic you show  
11 distribution of the crack size as input into the  
12 process. That's why I sort of got confused after you  
13 said that no assumptions were made of this.

14                  MR. HARRINGTON: And the crack size is  
15 represented by distribution. So, when a crack -- when  
16 we work through the initiation modeling process,  
17 there's an incubation time, and then the crack  
18 initiates, and the actual size of that crack at  
19 initiation is also something that we can represent by  
20 distribution, and sometimes it'll be a very tiny  
21 crack, sometimes it'll be a larger crack.

22                  MEMBER DIMITRIJEVIC: So, what are your  
23 assumptions then? So, then what is the leak rate  
24 which you assume the leak occurs, do you have, or you  
25 are analyzing different leak rates, you know, are they

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 like one gallon, five gallon per minute, or ten? And  
2 then when do you assume -- what is the leak rate when  
3 you assume the actual rupture occurred?

4 MR. HARRINGTON: Well, the rupture end is  
5 determined by fracture mechanics stability  
6 calculations. It's not driven by leak rate. So, at  
7 that point we're just tracking what the predicted leak  
8 rate is at each point, and then we can look at that  
9 after the fact to understand what the leak rate was at  
10 different points in time, different points in crack  
11 size on both ends.

12 MEMBER DIMITRIJEVIC: So, what is your  
13 definition of failure then?

14 MR. HARRINGTON: That's a complicated  
15 question, it's one that we've spent a lot of time  
16 discussing, and considering in the early development  
17 of XLPR. Failure depends on a lot of different  
18 things, and often failure is defined as rupture. But  
19 with the details that we have at our access in XLPR,  
20 you can define failure as one GPM leak rate, as some  
21 other particular LOCA size in flow rate terms, or  
22 rupture of the pipe. So, it gives you a lot of  
23 flexibility.

24 MEMBER DIMITRIJEVIC: Well, you are  
25 comparing this with the new LOCA data, which is clear

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the size of the LOCA is defined there, so that's what  
2 I was wondering, how you compare that. So, do you  
3 have -- if you want to compare the results, you should  
4 have a similar failure definition, right?

5 MR. HARRINGTON: Yeah, the failure  
6 definition is a challenge. In the regulations it just  
7 refers to rupture. But that is something we spend a  
8 lot of time on, and in my comments a few minutes ago  
9 on one of the earlier slides, I had said that we're  
10 using rupture as a proxy for LOCA. With LOCA, that's  
11 really defined in flow terms primarily. Rupture is  
12 defined in stability terms, and those are not exactly  
13 the same.

14 MEMBER DIMITRIJEVIC: Definitely not the  
15 same.

16 MR. HARRINGTON: But in this context,  
17 we're using rupture as a proxy for LOCA.

18 MEMBER DIMITRIJEVIC: Okay, I've got good  
19 news, and bad news. The good news -- well, the bad  
20 news is that we're a little behind. The good news is  
21 it doesn't matter, because we're going to make up a  
22 half hour for lunch because we can meet downstairs.  
23 But what I'd like to do is we're scheduled for a break  
24 now, this is a sort of semi convenient way to do a  
25 break.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           So, I would like to take a break now, our  
2 normal break from now until 10:40, and then we'll pick  
3 up the XLPR thing, is that agreeable folks? Thank  
4 you. So, we're all recessed for 15 minutes.

5           (Whereupon, the above-entitled matter went  
6 off the record at 10:26 a.m. and resumed at 10:40  
7 a.m.)

8           CHAIR BALLINGER: Okay, so let's go back  
9 in session, and I think Markus can pick it up.

10          MR. BURKARDT: Great, thank you very much.

11          Yeah, Markus Burkardt at Dominion  
12 Engineering, and I'll continue the discussion of the  
13 xLPR analysis work that we've been doing.

14          And so the xLPR analysis cases that we've  
15 been looking at have been applying PWSCC and/or  
16 fatigue material degradation mechanisms.

17          And so here when I talk about fatigue, I'm  
18 talking about fatigue that's driven by plant  
19 transience rather than like fatigue driven by local  
20 thermal fluctuations or vibration. So those are the  
21 kind of key material degradation mechanisms that are  
22 modeled within xLPR.

23          The analysis cases, as Craig mentioned,  
24 consider flaws of engineering scale. And so those  
25 flaws, we can either have them be present at the start

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 of the simulation and grow over an 80-year plant life  
2 period, or we can use initiation models to calculate  
3 the time to initiation

4 And then the flaws start growing at an  
5 engineering scale of, you know a couple millimeters,  
6 something that has k-controlled crack growth. And  
7 then have them evolve over time from there.

8 And in this work, we performed many  
9 sensitivity studies to determine the impact of changes  
10 to key analysis inputs. And I'll go into a little bit  
11 more detail on the specific sensitivity studies looked  
12 at later. But some of the parameters that were  
13 changed in these sensitivity studies include geometry,  
14 loading, welding residual stress profiles, or initial  
15 flaw sizes.

16 There are several outputs that we looked  
17 at as part of this work, some that are output directly  
18 by xLPR, and others that require a little bit of close  
19 processing. For the directly output outputs, the  
20 probability of rupture is kind of a key output that  
21 we're looking at. And that's used to calculate the  
22 rupture frequencies from comparison to NUREG-1829.

23 With xLPR, when looking at the probability  
24 of rupture output, you have the option of  
25 conservatively not crediting in-service inspection or

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 leak rate detection, or you can credit in-service  
2 inspection, or you can credit leak rate detection. Or  
3 you can credit in-service inspection and leak rate  
4 detection.

5 And so for cases the utilize the initial  
6 flaw model, those results are then conditional on  
7 crack initiation actually occurring. And so to kind  
8 of consider all of these cases and results on the same  
9 baseline, we also consider probability of crack  
10 initiation for cases that model that explicitly.

11 Additionally, if we're looking at time  
12 between detectable leakage and rupture, the leak rate  
13 is a key output that we look at as well.

14 For the results then that are  
15 post-process, using the leak rate data as well as the  
16 rupture time, we then calculate the time between one  
17 gallon per minute detectable leakage and rupture. And  
18 so in some cases in the slides, I might have used some  
19 shorthand here and called this the lapse time.

20 Then for cases where we obtain probability  
21 of rupture using the initial flaw model, you know,  
22 that's conditional on crack initiation. So as an  
23 approximation, we then scale that by the probability  
24 of initiation to approximate the probability of  
25 rupture, given crack initiation.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And then another approximation that we  
2           make as part of this comparison to NUREG-1829 is we  
3           take the probability of rupture at 80 years, average  
4           that over the 80-year time period, to come over an  
5           average 80-year rupture frequency. And as Craig  
6           mentioned, we use rupture as a proxy for LOCA in this  
7           comparison. So there's --

8           MEMBER DIMITRIJEVIC: This is Vesna  
9           Dimitrijevic. Again, I have a question. Sorry, I'm  
10          trying to understand, I'm very interested in your  
11          results on how they compared with the LOCAs since I'm  
12          PRA person.

13          So is this -- the input output you get  
14          from xLPR, what is this, is this per weld? For all  
15          pipe, per, you know, foot? What is the, you know,  
16          tell us the tactic of this ATS. What is the piping?  
17          The old plus-one piping? The, you know, per foot per  
18          weld?

19          MR. BURKARDT: So xLPR, in xLPR we model  
20          flaws within just one weld. And so this is basically  
21          a per-weld type result. But then in our work, we've  
22          looked at many different types of welds and  
23          considered, you know, the results from those many  
24          different welds.

25          MEMBER DIMITRIJEVIC: So but you compare

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 it with the, the number that you get, you assume some  
2 average number of the welds in the, you know, plus-one  
3 piping, is that how do you get total result? I mean  
4 --

5 MR. BURKARDT: No.

6 MEMBER DIMITRIJEVIC: in reference in size  
7 of the piping. So you know, in the -- how did you  
8 compare the results?

9 MR. BURKARDT: I think I'll get to this a  
10 little bit later in the presentation. And if you  
11 still have questions on the comparison, at that point  
12 maybe we can speak to that then.

13 MEMBER DIMITRIJEVIC: All right.

14 MR. BURKARDT: If that works for you.

15 MEMBER DIMITRIJEVIC: Yes, of course.

16 MR. BURKARDT: Thank you. So there have  
17 been some other recently performed xLPR studies that  
18 have been published by the U.S. NRC in two technical  
19 letter reports in the context of leak-before-break  
20 analyses for alloy-82/182, dissimilar metal piping  
21 butt welds in PWR piping systems.

22 And so this work was performed under a  
23 memorandum of understanding between NRC and EPRI,  
24 where the NRC and EPRI teams worked together in  
25 developing the set of cases to be considered. But

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 then each team independently developed the inputs for  
2 those cases, ran those cases, and interpreted the  
3 results.

4 So these two technical letter reports  
5 basically document the NRC's work and from -- so this  
6 is NRC Research who performed this work and then  
7 published those reports.

8 The first of the two technical letter  
9 reports that I'll speak to is the piping system  
10 analysis. And so this looked at a representative  
11 reactor vessel outlet nozzle and inlet nozzle in a  
12 Westinghouse four-loop PWR. And so for this technical  
13 letter report, we looked at an extensive set of  
14 sensitivity studies.

15 From the learnings of this report, the  
16 xLPR generalization study then looked at a much  
17 broader range of welds, looking at all the other  
18 outlet-82/182 dissimilar metal piping butt welds that  
19 had prior leak-before-break approvals from the NRC  
20 staff.

21 But the set of sensitivity studies per  
22 component was then greatly reduced based on the kind  
23 of findings and results of the piping system analysis  
24 and basically focused in on the ones that had greater  
25 effect and greater importance.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And so the results from these two studies  
2           in the work that I'm presenting were used where  
3           possible, but then supplemented with additional xLPR  
4           analysis cases, as needed.

5           And so there's many, many inputs to xLPR,  
6           thousands of inputs. And so it's tough to summarize  
7           all of those, but here are some of the key analysis  
8           summary inputs for the bases cases for each of these  
9           piping systems.

10           Here, colors on the plot highlight  
11           consistent wording. And then the blue box highlights  
12           the main loop piping welds, which are the focus of the  
13           ALS work.

14           And so here we basically looked at several  
15           different welds, welds in the reactor vessel outlet  
16           nozzle, the reactor vessel inlet nozzle, the steam  
17           generator inlet nozzle, the steam generator outlet  
18           nozzle, as well as the reactor coolant pump  
19           inlet-outlet nozzle welds.

20           And then also in the pressurizer surge  
21           nozzle. And then in CE hot leg branch lines and CE  
22           cold leg branch lines.

23           And so for the base cases, we model PWSCC  
24           crack growth rather than fatigue crack growth. We  
25           also explicitly modeled initiation. In most cases, we

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 modeled both axial and circumferential flaws, but for  
2 the piping system analysis, only circumferential flaws  
3 were considered initially.

4 Some different approaches were taken to  
5 model in seismic occurrences across the collection of  
6 these analyses. Most of the base cases don't consider  
7 mitigation. And in-service inspection leak rate  
8 detection are optional in the outputs that are  
9 considered.

10 And this cart kind of highlights the  
11 sensitivity studies that were performed. As you can  
12 see for the piping system analysis, there was a much  
13 longer list of studies that we considered.

14 We looked at initiation, at welding  
15 residual stress, at earthquakes, at normal operating  
16 thermal loads, changes to those, change to leak rate  
17 detection, changes to ISI modeling, application and  
18 mitigation. You know, what does fatigue mean.  
19 Changes to initial flaw size, geometry, consideration  
20 of axial cracks, hydrogen concentrations, different  
21 temperatures.

22 And so then the learnings from here we  
23 then had a narrowed scope of sensitivity studies that  
24 were considered in the generalization study. We were  
25 really focused on initiation, on welding residual

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 stress, on mitigation, in some cases fatigue.

2 So now getting into the comparisons with  
3 NUREG-1829 and xLPR. There are some differences that  
4 go into this comparison. And so kind of do the best  
5 we can here.

6 For context on the 1829, the LOCA  
7 frequencies that we're using for comparison were based  
8 on expert elicitation processes Craig discussed. And  
9 we're taking the results from Table 1 for this  
10 comparison. These are kind of the base case results  
11 from NUREG-1829, and that table summarizes median, 5th  
12 percentile, and 95th percentile results.

13 Here, those results are total PWR LOCA  
14 frequencies after over-confidence adjustments using an  
15 error factor scheme. They are 40-year fleet average  
16 values. And they consider typical in-service  
17 inspection and leak rate detection, as required by  
18 plant technical specifications.

19 And so these results are presented on a  
20 per-plant basis for each distinct LOCA category or  
21 LOCA size. And also the results in that table  
22 consider both the contribution of piping and  
23 non-piping passive systems.

24 And so there are a couple of differences  
25 between these results and the results that, you know,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 we're showing from xLPR. But we'll get into that.  
2 And so the xLPR results, they are 80-year results.  
3 We're looking at results from just one weld.

4 There's some differences in the material  
5 degradation mechanisms that, you know, that are  
6 considered in both of those efforts. But we're still  
7 trying to make comparisons here as best as we can.

8 Now, these two plots show with the gray,  
9 orange, and blue lines the LOCA frequencies from  
10 NUREG-1829 from Table 1. And then in -- with yellow  
11 points on both of these figures, we show the xLPR  
12 results that are basically rupture frequencies when  
13 considering leak rate detection and taking credit for  
14 that.

15 On the left figure, we're only crediting  
16 leak rate detection, on the right figure we're  
17 crediting both leak rate detection and in-service  
18 inspection. And so there are only, of those cases  
19 that I mentioned earlier, there are only three which  
20 actually have a non-zero occurrence of rupture with  
21 leak rate detection or with leak rate detection and  
22 in-service inspection.

23 MEMBER HALNON: Markus, do -- when you say  
24 leak rate detection, are you starting your lowest  
25 threshold 1 GPM, that's when you start detecting the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 leak?

2 MR. BURKARDT: Yes.

3 MEMBER HALNON: Okay, because most plants  
4 can do -- weld better than that, especially since the  
5 Davis-Besse.

6 MR. BURKARDT: Exactly, yeah, the one --  
7 the one GPM is a conservative --

8 MEMBER HALNON: These are even conservative  
9 from that standpoint.

10 MR. BURKARDT: That's correct.

11 And so yeah, so we show those points  
12 explicitly. And so also all three of these points are  
13 sensitivity studies that are cases where there's  
14 modeling in xLPR that's not fully representative of  
15 plant conditions and operations, like cases where  
16 application of an overlay ultimately leads to the  
17 cause of a rupture. Or where there's flaws that have  
18 initial depth deeper than the depth of an inlay.

19 So cases like that. But so as relevant to  
20 the ALS, we also further investigate those cases and  
21 speak to those a little bit more later in the  
22 presentation.

23 Then for --

24 MR. BLEY: It's Dennis Bley. Checking  
25 points across those, it looks like the ISI essentially

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 has no impact all on here. Is that because they're so  
2 far apart, or do you know what's going on? Is there  
3 enough here to say ISIs are not doing us any good?  
4 Leak rate detection?

5 MR. BURKARDT: You're looking at the  
6 yellow dots between the left figure and the right  
7 figure?

8 MR. BLEY: Yeah.

9 MR. BURKARDT: And so the yellow dots drop  
10 by two orders of magnitude in terms of LOCA frequency  
11 once you credit in-service inspection. In addition to  
12 leak rate detection.

13 MEMBER MARCH-LEUBA: The lines don't  
14 change from left to right because they're --

15 MR. BURKARDT: The lines? Oh, the  
16 NUREG-1829 lines already consider both in-service  
17 inspection and leak rate detection, as I mentioned in  
18 my opening.

19 MEMBER MARCH-LEUBA: So they're both the  
20 same.

21 MR. BURKARDT: So they're both the same,  
22 and it's just the xLPR results that I'm showing  
23 relative to those numbers and how those change. And  
24 so I show the cases with non-zero occurrence of  
25 rupture with leak rate detection explicitly on both of

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the figures. And then on the figure on the left, also  
2 showing cases where there were no ruptures with leak  
3 rate detection.

4 And so here I calculate a 95% upper bound  
5 based on a one-sided conference interval using a  
6 binomial distribution. And so that considers the  
7 number of realizations.

8 And for cases that are utilizing the  
9 initial flaw model, we're also scaling back then by  
10 the probability of initiation. So that given that  
11 those cases would otherwise be conditional on crack  
12 initiation.

13 And so those are all shown with the green  
14 points with arrows pointed downward to indicate that  
15 if additional realizations were evaluated in xLPR. If  
16 there are no ruptures are predicted, then those  
17 probabilities would be even lower.

18 MEMBER DIMITRIJEVIC: So did you assume  
19 the probability of detection is 1, both in ISI and in  
20 the, you know, leak detection?

21 MR. BURKARDT: So for in-service  
22 inspection, the probability of detection is based on  
23 a logistic model that's informed by the EPRI  
24 performance demonstration initiative. And so no, it's  
25 not a -- not a probability of 1 there.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           For leak rate detection, yes, that is  
2 closer to like a probability of 1 type model. There  
3 is some uncertainty applied to the leak rate in  
4 comparison to the leak rate detection thresholds  
5 within xLPR. And that's more of deterministic  
6 assessment as to whether that leak is detected or not  
7 prior to a rupture occurring.

8           MEMBER DIMITRIJEVIC: This is all on one  
9 weld, right, so that's --

10          MR. BURKARDT: That's correct.

11          MEMBER DIMITRIJEVIC: Okay, so  
12 interesting, yeah.

13          MR. BURKARDT: And so another output, or  
14 I guess the last point here was just that when  
15 considering in-service inspection and leak rate  
16 detection, the LOCA frequency is estimated from xLPR,  
17 albeit with slightly different, you know, assumptions  
18 and considerations that go into the comparison or on  
19 a similar order of magnitude as the median LOCA  
20 frequency estimates from NUREG-1829.

21          So then another --

22          MEMBER DIMITRIJEVIC: But your estimates  
23 are just for one weld. So even if we assume there is  
24 only one weld in Class I, you know, exposed to that  
25 degradation mechanism, I mean, I don't really know how

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 good is this comparison. We need to think a lot about  
2 that, actually, you know, so.

3 Because this, you know, maybe they are,  
4 you know, comparing apples and oranges. You know,  
5 that if you're looking just in one weld exposed to  
6 that specific degradation mechanism and on a different  
7 timeframe, I don't know how well that compares to the  
8 NUREG, so.

9 MR. BURKARDT: So for these welds, the  
10 kind of key -- or in these piping systems, the welds  
11 are of particular interest or concern are the 82/182  
12 dissimilar metal welds. And in like one loop or one  
13 plant, there's really only a handful of those.

14 And so at that point, you're considering  
15 whether you're looking at results from just one weld  
16 or, you know, maybe up to eight welds.

17 And there you're then -- some things to  
18 consider is how do you combine the probabilities of  
19 failure from those individual welds and do you just  
20 like do you combine those as a individual  
21 probabilities that are -- that are unrelated, or do  
22 you consider them as having like a related probability  
23 of failure.

24 And so there's different approaches and  
25 methodologies that have been discussed for that sort

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 of comparison within like the xLPR work that's been  
2 done.

3 MR. BLEY: Hey, this is Dennis again. I'm  
4 just trying to understand this picture. The main --  
5 well, we're looking at two main things, I think. One  
6 is the three orange dots at about a break size of ten  
7 and a little over 30. And they drop by two to three  
8 orders of magnitude.

9 Then you have the little green ones, which  
10 are the 95% upper bound. And two of three orange dots  
11 are above that 95% upper bound. And that's just a  
12 result of the calculation of the probability, the  
13 uncertainties in there?

14 MR. BURKARDT: Yes, so those three dots  
15 are fairly extreme cases that aren't really  
16 representative of plant conditions and operations.  
17 And so that's why those dots are, you know, have  
18 higher probabilities.

19 And for the green circles with the arrows,  
20 there no ruptures with leak rate detection are  
21 predicted by xLPR.

22 MR. BLEY: Okay, and the length of the  
23 arrow means something?

24 MR. BURKARDT: The length of the arrow  
25 does not mean anything.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. BLEY: Okay.

2 MR. BURKARDT: Just the position of the  
3 circles means something, and that's based on the  
4 number of realizations that's evaluated and also the  
5 probability of initiation.

6 MR. BLEY: I think I'm beginning to get  
7 it, but not wholly. Okay, thanks.

8 MEMBER KIRCHNER: Yeah, may I follow on  
9 and ask what dominates the results that you're  
10 getting? Is it the assumptions on crack growth or  
11 crack size that actually dominate the results?

12 MR. BURKARDT: So crack initiation is a  
13 dominating factor.

14 MEMBER KIRCHNER: Yeah.

15 MR. BURKARDT: And that's a secondary  
16 factor, factors leading to more rapid crack growth are  
17 kind of the two key mechanisms.

18 MEMBER KIRCHNER: Like corrosion or  
19 whatever.

20 MR. BURKARDT: That's right. Yeah,  
21 basically for like primary water stress corrosion,  
22 cracking, higher stresses, higher temperatures ,  
23 things of that nature.

24 MEMBER KIRCHNER: Now, how does the  
25 overlay of seismic impact these results? Is that a

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 major contributor to the stress, or does it just shift  
2 the curves, almost, you know, doesn't change the shape  
3 or anything? It just shifts them in terms of  
4 probability space?

5 MR. BURKARDT: So seismic in xLPR is  
6 modeled in two different ways. One, in one way it is  
7 basically modeled as additional stresses that occur at  
8 some periodicity. And then that's considered in  
9 stability calculations that are being performed.

10 And so when seismic is modeled, basically  
11 you have slightly elevated probabilities of rupture  
12 due to that. But there's no -- yeah, we haven't, so  
13 far we haven't see that to be --

14 MEMBER KIRCHNER: You don't see a cliff  
15 edge effect with the seismic considerations. In other  
16 words, something equivalent to like brittle fracture,  
17 where you just get a large, a resultant large rupture  
18 that goes beyond just from kind of propagating a crack  
19 over time with stress and corrosion factors.

20 Do you see a step change with the seismic  
21 stresses added to the model?

22 MR. BURKARDT: No, we do not.

23 MEMBER KIRCHNER: So you don't see any  
24 cliff edge effects? So this is within the SSE  
25 spectrum and -- I'm just trying to understand.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 Usually, for a lot of these kind of issues, seismic is  
2 often dominant. So you're staying within the SSE and  
3 then using the spectrum, the implant structural motion  
4 spectrum, or?

5 MR. BURKARDT: So xLPR doesn't include  
6 like spectral seismic analyses. We can only input  
7 like a specific earthquake like magnitude, like in  
8 terms of piping stress. And then a specific frequency  
9 of occurrence, rather than a spectrum of frequencies  
10 of occurrence and a spectrum of, you know, seismic  
11 stresses.

12 And so yeah, the kind of stresses that we  
13 apply for this are the, yeah, for the SSE-type seismic  
14 events. And we pick a typical like seismic occurrence  
15 of that event as part of those analyses.

16 MEMBER KIRCHNER: And those are factored  
17 in these results we're seeing here, or they are --

18 MR. BURKARDT: They are.

19 MEMBER KIRCHNER: They are. Because you  
20 took the seismic out with those two dots have a much  
21 lower frequency?

22 MR. BURKARDT: Not substantially, I  
23 believe. Slightly but not substantially.

24 MEMBER KIRCHNER: Okay, thank you.

25 MR. BURKARDT: Go ahead and move on.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 There's another output that we look at, which is the  
2 time between detectable leakage and rupture. And so  
3 here, just I want to provide a little bit of context  
4 first just on kind of help unpack some of the later  
5 slides that I have here.

6 And so xLPR models many, many realizations  
7 in one analysis case. And so each individual  
8 realization is basically looking at flaw growth in  
9 evolution within a specific weld.

10 And so here I've just picked an example  
11 case to kind of depict what that looks like in terms  
12 of detectable leakage to rupture and how the leak rate  
13 evolves over time for that type of like sample case.

14 I have the details listed on the left  
15 here, but that's not important for the purpose of this  
16 discussion. And so really it's just that you go from  
17 a part through-wall flaw to a transitioning  
18 through-wall flaw. That transitioning through-wall  
19 flaw then starts to leak, and then continues to grow  
20 until you get an idealized through-wall flaw.

21 That flaw then continues to leak further  
22 as the flaw grows more and more around the  
23 circumference of the welds, until eventually rupture  
24 occurs. And so the leak rate basically evolves over  
25 time and we're calculating the leak rate based on the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 flaw size as part of this assessment.

2 So this is for one realization. And in an  
3 analysis case, there can be many realizations that  
4 result in rupture. And so you can kind of build a  
5 distribution from that. And then we use a couple of  
6 terms to help describe that distribution that I'll  
7 summarize in some of the later slides.

8 And so, you know, we look at the mean. We  
9 look at the standard error. And so in later slides  
10 I'll have error bars on the mean that show that. And  
11 here by standard error, I mean the standard deviation  
12 divided by the square root of the sample size.

13 We also look at the minimum, as well as a  
14 95 tolerance interval, assuming that the data are  
15 locked normally distributed. So this is kind of we  
16 have a distribution of these times from detectable  
17 leakage to rupture for an individual case.

18 And so then we look at the collection of  
19 cases and look at the summary statistics on the times  
20 from detectable leakage to rupture for all of those  
21 cases for additional context.

22 And so this is just kind of a screening  
23 exercise that we perform. The slide that I'm showing  
24 now basically shows the mean times from detectable  
25 leakage to rupture for all of these cases.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 I just want to highlight the cases of  
2 importance for the ALS work or the reactor coolant  
3 piping hot leg and cold leg. So those are shown in  
4 orange and blue.

5 And then also I wanted to make a  
6 distinction between the base case results, which are  
7 circled, what have points circled in black, and the  
8 sensitivity studies, which have no black circle around  
9 the points.

10 So in addition to looking at the kind of  
11 distribution of mean times between detectable leakage  
12 and rupture, we also looked at the minimum times. So  
13 this is now for an analysis case that could have many,  
14 many times between detectable leakage and rupture.

15 The very minimum of those individual  
16 cases, we look at those and we use that as a screening  
17 exercise where we then do further investigation of the  
18 cases that have relatively short minimum times from  
19 detectable leakage to rupture, under three months.  
20 And so I'll get into those specific cases further in  
21 the presentation.

22 But all of those cases are sensitivity  
23 studies, and they either considered unmitigated welds  
24 subject to primary water stress corrosion crack growth  
25 at either the hot leg or the pressurizer temperatures.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 Or they included modeling that was not representative  
2 of plant conditions and operations.

3 And so I just want to emphasize the  
4 unmitigated statement here in that all currently  
5 existing 82/182 welds at pressurizer temperature are  
6 now mitigated. And a large majority of the components  
7 at hot leg temperature are also mitigated. So it's  
8 just kind of the detail to point out there.

9 CHAIR BALLINGER: Yeah, this is Ron  
10 Ballinger again. Those last two slides, we recenter  
11 ourselves. xLPR was originally built to just look at  
12 crack growth. You're applying gear to LOCA issues.

13 And so those last two slides are pretty  
14 key, with all the caveats that are involved, what  
15 they're telling us, and by the way we're likely to see  
16 this kind of analysis as a committee going forward for  
17 other -- you know, we haven't see this yet.

18 The chances of a non-detectable leak  
19 giving us a problem is very low. Is that the message  
20 I'm taking away from here?

21 MR. BURKARDT: That's correct.

22 CHAIR BALLINGER: Because like, remember  
23 Halnon said one gallon a minute, that's an upper  
24 bound. We'll see that way below one gallon a minute.  
25 And so if you factor that in over here, that reduces

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the likelihood, I won't say probability, that you'll  
2 miss something. So very, very low value.

3 MR. BURKARDT: You'll reduce that  
4 detectability threshold for unidentified leakage, and  
5 then that brings the time at which you would detect  
6 that to the left giving you further temporal margin to  
7 eruption.

8 CHAIR BALLINGER: You're basically risking  
9 forming the LOCA analysis. That's the whole purpose  
10 of this.

11 MR. BURKARDT: Mm hm.

12 CHAIR BALLINGER: Thanks.

13 MEMBER KIRCHNER: There's some detail on  
14 that slide that's hard to extract, but let me see if  
15 I can put it into a question. So the surge line I  
16 presume is the pressurizer, and that sees a lot more  
17 transient. Is it dominated by fatigue or stress,  
18 corrosion, cracking?

19 MR. BURKARDT: A lot of the pressurizer  
20 cases there are modeled as being unmitigated. So a  
21 lot of that is just due to the elevated temperature.

22 MEMBER KIRCHNER: Right.

23 MR. BURKARDT: Elevated pressurizer  
24 temperature and subject to PWSCC growth in an  
25 unmitigated component.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER KIRCHNER: So those show on this  
2 probabilistic trajectory earlier detectable leakage  
3 before rupture. Or earlier rupture. How do you --

4 MR. BURKARDT: Shorter times.

5 MEMBER KIRCHNER: How do you read the  
6 cumulative distribution?

7 MR. BURKARDT: It's just a way to sort the  
8 data. It shows -- so the, you have a surge lines  
9 cases here show shorter times from one gallon per  
10 minute detectable leakage to rupture. And that's  
11 largely attributed to the faster crack growth, the  
12 pressurizer temperature. And --

13 MEMBER KIRCHNER: But how does one make  
14 this --

15 MR. BURKARDT: That's what I'm pointing  
16 out --

17 MEMBER KIRCHNER: Yeah, so but let's just  
18 pick a point that happens to fall on one of your grid  
19 lines. So you're showing the surge line there at .2  
20 cumulative distribution and roughly minimum time. A  
21 least rupture two months.

22 MR. BURKARDT: Mm hm.

23 MEMBER KIRCHNER: And then the other green  
24 dots are just because of the different variations in  
25 input that you put in.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. BURKARDT: That's correct.

2 MEMBER KIRCHNER: So in a worst-case  
3 scenario, then, how do I read those dots that fall on  
4 the ordinate?

5 MR. BURKARDT: Those --

6 MEMBER KIRCHNER: That has no time to --  
7 from detectable leakage to rupture? How do I read  
8 that?

9 MR. BURKARDT: So those are cases where  
10 you basically have rupture either prior to or at the  
11 time where you would have detectable leakage. And so  
12 those cases are cases that we then want to sharpen the  
13 pencil on, better understand, and look into further.  
14 So that's where my presentation is going next.

15 MEMBER KIRCHNER: Okay, thank you.

16 MR. BURKARDT: Okay, so looking at those  
17 cases, we basically performed further investigation of  
18 limiting cases that had either minimum times between  
19 detectable leakage and rupture, less than three  
20 months.

21 So that includes the ones with zero months  
22 times that we pointed out. And then also the cases,  
23 the three cases that had non-zero occurrence of  
24 rupture with leak rate detection, we looked at those  
25 as well.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And so then we reran these cases with  
2 refined time stepping or updated input model  
3 parameters that we felt were more realistic. We also  
4 investigated inputs to xLPR, intervening variables and  
5 outputs to better understand the applicability of the  
6 scenarios being modeled.

7           And so after this dispositioning, for the  
8 cases that are relevant to the ALS, the minimum time  
9 from detectable leakage to rupture for a base case is  
10 14 months, and for a sensitivity study it is 0.8  
11 months.

12           So then I mentioned we had also wanted to  
13 look at an additional figure of merit, the 9595  
14 tolerance interval. And so for the cases that had  
15 these limiting minimum times, we computed a 9595  
16 tolerance interval using a log normal distribution and  
17 explaining the data.

18           And so this is defined such that there's  
19 a 95% probability that the constructed limits contain  
20 95% of the population of interest for the surveillance  
21 interval that's selected. And so when we look at  
22 this, then the 9595 lower bound for the most limiting  
23 of the sensitivity studies that's representative of  
24 the U.S. PWR fleet is 3.8 months.

25           And so just again highlighting the fact

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 that the sensitivity studies, they were less  
2 constrained to maintaining fidelity to realistic plant  
3 conditions. So some of them were perhaps a little bit  
4 more extreme and unrealistic.

5 And they're also defined to informed  
6 understanding of the base case results by  
7 investigating some of the key inputs that are known to  
8 have influence on the xLPR results.

9 CHAIR BALLINGER: This is Ron Ballinger  
10 again. Once again, these are postdictions.

11 MR. BURKARDT: Mm hm.

12 CHAIR BALLINGER: Primarily because all of  
13 these wells are mitigated.

14 MR. BURKARDT: Correct.

15 CHAIR BALLINGER: So we're basically  
16 predicting something that can't happen because the  
17 welds are -- the welds are mitigated.

18 MR. BURKARDT: Some are unmitigated. And  
19 in the sensitivity studies, we also looked at  
20 mitigated weld cases as well.

21 CHAIR BALLINGER: But I thought that you  
22 said that as far as you knew, in the fleet, all the  
23 pressurizer surge line wells have been mitigated or  
24 probably replaced.

25 MR. BURKARDT: But for the cases relevant

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 to the ALS, it's the main loop piping.

2 CHAIR BALLINGER: Okay.

3 MR. BURKARDT: And so those cases, there  
4 are plants that still have unmitigated hot weld hot  
5 leg components. And so those do need to be considered  
6 as part of that effort.

7 CHAIR BALLINGER: Okay.

8 MR. BURKARDT: I'm now jumping to my  
9 conclusions. So when we looked at crediting and  
10 service inspection and leak rate detection, the  
11 occurrence rupture results were on a similar order of  
12 magnitude as the NUREG-1829 LOCA frequency estimates.  
13 Acknowledging that there are some differences in  
14 better -- made as part of the comparison.

15 The only non-zero results that were found  
16 were for cases including modeling that was not  
17 representative of plant conditions in operations. And  
18 for the cases with zero ruptures with leak rate  
19 detection, we, for purposes of comparison, computed a  
20 95% upper bound based on a one-sided conference  
21 interval.

22 Then for all of the base cases and most of  
23 the sensitivity cases, considered minimum times from  
24 one gallon per minute detectable leakage to rupture  
25 exceeded three months. And the 95% tolerance

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 interval for the limiting sensitivity study that was  
2 representative of the U.S. PWR fleet, the lower bound  
3 there came out to be 3.8 months.

4 That's all I have for the prepared  
5 presentation. Open to any other questions you may  
6 have. Thank you for listening.

7 MEMBER DIMITRIJEVIC: I'm curious, did you  
8 look in the -- did you compare that with the results  
9 form like in-service inspections, you know, through  
10 the history of that? I know you don't have anything  
11 on the ruptures, but you may have detected leaks, and  
12 you know, and all that degradation mechanisms.

13 Did you try to compare your, you know,  
14 soft results with empirical data?

15 MR. BURKARDT: So the initiation models  
16 were calibrated considering like in-service inspection  
17 results. Not only those but also laboratory data. So  
18 they were considered in that manner.

19 And they've also been, I think not  
20 directly the plant data, but the performance  
21 demonstration initiative, like calibration mockup or  
22 test mockup specimens, which are meant to be, you  
23 know, fairly realistic to plant components. Those  
24 have been used in calibration and development of the  
25 in-service inspection probability of detection and

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 sizing models.

2           There's been other validation that's  
3 performed for, you know, all of the individual  
4 sub-models. And as part of those efforts, if field  
5 data was available, field data were used in those  
6 validation efforts. But in some cases, as you pointed  
7 out, like for rupture, there wasn't a lot of field  
8 data available, or any.

9           And so then, you know, laboratory data had  
10 to be considered instead as part of those validation  
11 efforts.

12           MEMBER DIMITRIJEVIC: Thank you.

13           CHAIR BALLINGER: Questions from members?  
14 They're open. We just eliminated the quandary.

15           This is a convenient place to break for  
16 lunch, even though it's bit early. The folks  
17 downstairs are open. So we can do that. And I  
18 understand, do we still have a problem with one of the  
19 presenters?

20           MR. WELLS: Maybe, maybe not.

21           CHAIR BALLINGER: So we --

22           MR. WELLS: Suresh, I think you're on, do  
23 you want --

24           CHAIR BALLINGER: Do we have a cumulative  
25 distribution for that?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. WELLS: Suresh, do you want to try to  
2 unmute yourself and just do a quick audio check?

3 CHAIR BALLINGER: Well, what I'm going to  
4 propose is that we break for lunch now.

5 MR. WELLS: Yeah, okay.

6 CHAIR BALLINGER: Take an hour.

7 MR. WELLS: Okay.

8 CHAIR BALLINGER: And then within that  
9 hour, hopefully we can get that sorted out. Because  
10 he's a presenter, so we got to be sure that we're  
11 under control on that one.

12 MR. WELLS: Okay.

13 CHAIR BALLINGER: So unless there are  
14 other circumstances that would say we don't do that,  
15 that's what I would like to do.

16 MR. WELLS: Well, the only consideration  
17 we've been trying in the background to figure out is  
18 Erich is actually in France. So the longer we wait,  
19 the later it gets there. But --

20 MR. WIMMER: That's no problem.

21 MR. WELLS: Yeah? Okay.

22 MR. WIMMER: For me, I'm fine.

23 MR. WELLS: Okay, all right. Thank you,  
24 Erich.

25 MR. WIMMER: I'm actually in Vienna.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. WELLS: Oh, you're still in Vienna,  
2 okay.

3 MR. WIMMER: Okay, so that's fine.

4 CHAIR BALLINGER: You don't need to throw  
5 him under the bus.

6 MR. WELLS: Yeah.

7 MS. KUCUK: So I think in that case Mr.  
8 Kucuk and Erich will be --

9 CHAIR BALLINGER: I'm trying to --

10 MS. KUCUK: He may not be on yet, so.

11 MR. WELLS: He may not be on yet. Okay,  
12 so we'll get him on the lunch break. And maybe try to  
13 come back to test him maybe ten minutes before we plan  
14 to start.

15 CHAIR BALLINGER: Very good, thank you  
16 very much.

17 MR. MOORE: So this is Scott Moore. We  
18 can turn off the room audio until ten minutes prior to  
19 we pick up? Okay, thanks.

20 CHAIR BALLINGER: All right, so I'm going  
21 to propose that it's now 11:20 -- we meet, we'll come  
22 back here at 12:30. Thank you.

23 (Whereupon, the above-entitled matter went  
24 off the record at 11:23 a.m. and resumed at 12:30  
25 p.m.)

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 CHAIR BALLINGER: Okay, we're on the air.  
2 So thanks for coming back after lunch. If any of you  
3 have, any members have actually looked at the  
4 schedule, you're probably now going to be confused,  
5 because we've changed the order. So stick around and  
6 we'll eventually get to the presentation that you  
7 thought you were going to hear. So we're going to  
8 start with Fred Smith, right?

9 MR. SMITH: Yes.

10 CHAIR BALLINGER: And then we deviate from  
11 there. So go ahead, thanks.

12 MR. SMITH: Yeah. Thanks. So I'm going  
13 to keep along the same path as the xLPR work, because  
14 we're using that as part of the ALS strategy. And  
15 ALS, you probably wonder, alternative to what. And so  
16 the kind of traditional deterministic approach is what  
17 we would consider the normal approach to dealing with  
18 FFRD. ALS includes risk insights. They're still  
19 fundamentally a deterministic analysis. But there are  
20 deviations that we're including risk insights to  
21 modify the approach.

22 CHAIR BALLINGER: You might know that we  
23 reviewed the RIL, or risks, or whatever they called  
24 it.

25 MR. SMITH: The RIL, yeah.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 CHAIR BALLINGER: And we wrote a letter,  
2 and that letter suggested that they use a risk-based  
3 informed approach, let's put it that way.

4 MR. SMITH: Yes. And I agree.

5 (Simultaneous Speaking.)

6 MR. SMITH: So the objectives of the ALS  
7 includes both deterministic and risk-informed  
8 insights. And the objective is to obtain NRC approval  
9 of the generic method to address PWR LOCA induced FFRD  
10 in an expeditious manner.

11 The activities for the traditional  
12 deterministic approach are ongoing and will take  
13 additional research and time. And so this will  
14 provide the benefits of higher burn-up sooner. So we  
15 want to -- we don't intend to rely upon additional  
16 integral LOCA tests. So we're not tying ourselves to  
17 the TREAT test program, for example, although there  
18 are some cladding tests that are used to support this,  
19 particularly to address burn-up effects, but limit the  
20 licensing complexity and risk by largely relying upon  
21 previously approved methods and strategies.

22 But of course there are burn-up effects  
23 that would need to be incorporated into the currently  
24 approved methods. And those would be part of the  
25 submittal.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And then minimize the plant-specific,  
2           simplify the plant-specific implementation. So this  
3           would be a generic topical that would be easy to  
4           demonstrate compliance with the boundary conditions  
5           for the analysis. And then a plant can then add  
6           whatever other licensing basis issues that need to be  
7           addressed.

8           CHAIR BALLINGER: Okay, you've used the  
9           magic word, topical.

10          MR. SMITH: Okay.

11          CHAIR BALLINGER: What's the schedule for  
12          that?

13          MR. SMITH: Well, what we have  
14          communicated and continue to support is either between  
15          the end of this year and the end of the first quarter  
16          next year.

17          CHAIR BALLINGER: Thank you.

18          MR. SMITH: This is confusing me, because  
19          this is slow here.

20                 So the basic approach is that the large,  
21                 intermediate-break LOCA, we're going to show that  
22                 there's no clad rupture using traditional  
23                 deterministic methods.

24                 So in the previous conversation we talked  
25                 about pressurizer surge lines potentially having a

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 different performance. So the pressurizer surge line  
2 is inside the deterministic LOCA and can be evaluated  
3 just like any other LOCA analysis.

4 The large-break LOCA will be determined  
5 based upon more realistic treatment considering xLPR  
6 calculations that you've seen. We're crediting leak  
7 before break for piping. It's already qualified for  
8 leak before break.

9 All PWRs in the country that have main  
10 loop piping, already analyzed and qualified for leak  
11 before break, demonstrate that there's ample time  
12 between a precursor event, detectable leakage, and  
13 rupture to address large amounts of potential  
14 uncertainty and risk, and then crediting the existing  
15 tech specs that require you to shut down the plant and  
16 therefore reduce the KT. So if there could be a  
17 hypothetical LOCA in those conditions, it would have  
18 no consequence to fuel fragmentation.

19 So the rationale is, you know, we have the  
20 capacity under those conditions to address large-break  
21 LOCA for 5046. We're not proposing to change the  
22 treatment of LOCA only with regard to FFRD. So plants  
23 will still need to do a full 5046 analysis. But for  
24 -- yeah, okay -- but for FFRD we're going to justify  
25 that credit for LBB is appropriate as a more realistic

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 treatment.

2 There are examples here of the history, if  
3 you look at the types of events that have been  
4 justified, LBB of course, the initial asymmetric loads  
5 events. But somewhat more representative of our  
6 condition are credit for control rod scram and fuel  
7 mechanical loads do credit LBB and are not addressed  
8 in large-break LOCA today.

9 So, I'm sorry, it's a little delay here.

10 So we apply the xLPR analysis, as we've  
11 already discussed that, when we limit it to large pore  
12 cooling systems, then the probability of the initial  
13 event itself goes essentially almost to zero. It  
14 doesn't go all the way to zero, because they stop the  
15 computers. You know, they don't even run so many  
16 realizations. But it is approaching a very, very  
17 small value.

18 And then the time between detectible leak  
19 and rupture is sufficiently large that, considering  
20 operator response, uncertainties become extremely low.  
21 And in fact, it becomes not credible that somehow you  
22 could have operating crews over the 3.8 months not  
23 react for the tech specs and shut the plant down.

24 MEMBER KIRCHNER: Fred, this is Walt  
25 Kirchner. Could you just elaborate on the green

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 arrows on the bottom. I think Craig mentioned 14  
2 inches earlier in his presentation. Is there some  
3 kind of spectrum there where you've done sensitivity  
4 analyses to determine, you know, what that threshold  
5 is for inducing FFRD?

6 MR. SMITH: Yeah. So for the green arrow  
7 on the left, that's all intermediate and large-break  
8 piping for the various in Triple S configurations. So  
9 the actual diameter changes a little bit with in  
10 Triple S design, so we took the numbers off. So the  
11 deterministic methods will include everything from the  
12 pressurizer, surge line, and accumulator line on down.  
13 So the full spectrum analysis is being done for all  
14 the in Triple S that's being considered.

15 CHAIR BALLINGER: So I'm looking at those  
16 green arrows again, like Walt is. And the one goes to  
17 the left says we're not going to do anything, you  
18 know, get clad bursts, so we don't have to worry about  
19 it.

20 MR. SMITH: We're going to demonstrate  
21 that you don't get clad bursts.

22 CHAIR BALLINGER: Oh, okay, demonstrate  
23 that you don't get clad bursts. If that's true, then  
24 you don't have to do anything.

25 And the one to the right says the LBB

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 evaluation does not include FFRD in LOCA evaluation  
2 and model.

3 MR. SMITH: Right.

4 CHAIR BALLINGER: Does that mean you're  
5 going to get rid of FFRD as well there?

6 MR. SMITH: We're going to say that  
7 there's no credible scenario for LOCA induced FFRD for  
8 large core piping based upon the fundamental  
9 probabilities of large core rupturing and the large  
10 time between detectible precursors and rupture that  
11 gives you more than adequate response to shut the  
12 plant down.

13 The heat loads are very low, and therefore  
14 you've lost the motive force for LOCA to occur. And  
15 even if you decide to simulate that with a LOCA model,  
16 you would get no rupture.

17 CHAIR BALLINGER: So in this path forward,  
18 what's the long pole in the tent in terms of coming to  
19 the agency and saying we don't want to do this? We  
20 want to implement this. What's the long pole in the  
21 tent, which is going to be the hardest to --

22 MR. SMITH: Well, you brought it up  
23 earlier. And so as you mentioned, the Commission's  
24 directed the staff to begin rulemaking, include FFRD.  
25 We've engaged with the staff on a number of occasions.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 But, of course, we're not privy to their  
2 deliberations.

3 There is a policy from 1986, '87, that  
4 says that LBB should not be used for ECCS evaluations.  
5 And so I think the long pole is to convince the  
6 Commission to reconsider that policy.

7 Now that policy, when you read that they  
8 did take an active effort to consider that in '87,  
9 they said we're not going to close the book on this.  
10 But industry hasn't identified any safety benefits.  
11 And so we're going to put this on the table. And so  
12 we're identifying safety benefits associated with high  
13 burn-up. And I'll talk about those later.

14 And so that, to me is the challenge to get  
15 alignment with the staff and the Commission on  
16 crediting LBB.

17 CHAIR BALLINGER: But one of the criteria  
18 that the staff is proposing, where you have to  
19 consider FFRD or relocation and fragmentation, is  
20 55,000 megawatt-days per.

21 MR. SMITH: Yeah.

22 CHAIR BALLINGER: That's way below high  
23 burn-up.

24 MR. SMITH: Yes. So the cases in the  
25 arrow on the left, we'll consider the fuel that's

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 susceptible, and evaluate the LOCA, and then determine  
2 that --

3 CHAIR BALLINGER: If you don't get burst,  
4 it doesn't matter.

5 MR. SMITH: Yeah. We're not worried about  
6 burst for fresh yield, but everything above the  
7 acceptance criteria.

8 MEMBER KIRCHNER: And now, Fred, this is  
9 Walt again. So to elaborate on Ron's question,  
10 obviously you could get clad failure with a small-  
11 break LOCA under certain circumstances. But you're  
12 basically saying you don't have the differential  
13 pressure that's the driving mechanism for FFRD.

14 So you're not necessarily -- on the left  
15 arrow you'll analyze where there is an issue or not,  
16 of course, but you're basically saying that on the  
17 left arrow you don't have the differential pressure  
18 that would result in the driving mechanism for FFRD.

19 (Simultaneous Speaking.)

20 MEMBER KIRCHNER: And will the staff  
21 accept that?

22 MR. SMITH: Ha, ha, ha. I don't have my  
23 crystal ball with me, so --

24 MEMBER KIRCHNER: No. But are they  
25 indicating technically that's the way they view the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 issue?

2 MR. SMITH: So let me just clarify one  
3 thing. And you're right, there's a differential  
4 pressure component. But, you know, for the ballooning  
5 rupture that's associated with FFRD, you need to get  
6 to it at least to hike clad terminal pressure,  
7 terminal temperature. So it's 600, 700 degrees C.  
8 And so the combination, if you get some ballooning,  
9 then you'll have relocation potentially. And we'll  
10 evaluate that. But if you don't get enough  
11 ballooning, then you won't get rupture. And so that's  
12 --

13 MEMBER KIRCHNER: But you won't get beyond  
14 three percent strain. To me that's their criteria.

15 (Simultaneous Speaking.)

16 MEMBER KIRCHNER: So, Fred, to support  
17 this, with the high burn-up fuels it seems to me  
18 you're going to have to demonstrate to the staff that  
19 the fission gas release doesn't result in a buildup of  
20 excess pressure within the clad.

21 Given that you've got a fixed elevation  
22 for the fuel to fit into the existing plant designs,  
23 are you confident with the high burn-up that you're  
24 not going to see a high fission gas release, a rapid  
25 fission gas release, and a pressure spike from that on

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the left-hand arrow spectrum of events?

2 MR. SMITH: We are including, and it is  
3 a work in progress, but we are including transient  
4 fission gas release effects in the model. And so we  
5 expect to be able to demonstrate that those are  
6 adequately modeled and those effects are credibly  
7 captured. Next slide --

8 MEMBER KIRCHNER: Are your vendors  
9 considering, you know, it's desirable obviously to  
10 have helium in the clad fuel for heat conduction  
11 reasons. Are they looking at lowering the charge  
12 pressure for new fuel?

13 MR. SMITH: Probably not. You know, the  
14 helium also suppresses fission gas release early on.  
15 So you wind up with a lower total internal pressure if  
16 you have a charge. But you're correct in that the  
17 internal pressure may be a challenge against the no  
18 clad liftoff criteria. And so there are some changes  
19 to the rod configuration that will accompany this to  
20 make sure you make those design objectives met.

21 CHAIR BALLINGER: But the no liftoff  
22 criteria doesn't apply in a LOCA.

23 MR. SMITH: But it applies before the  
24 LOCA.

25 CHAIR BALLINGER: Yeah, yeah. Okay.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. SMITH: Yeah. And this is kind of on  
2 topic just summarizing, you know. And details of this  
3 are proprietary, but this part is not. But it kind of  
4 goes to what we were talking about.

5 So from a LOCA model perspective, we're  
6 looking at bounding PWR ECCS models and really one set  
7 of parameters with bounding assumptions for in Triple  
8 S configuration. And so we've done the fuel  
9 management for 18 to 24 month cycles with high burn-up  
10 and high enrichment.

11 And so the nuclear characteristics, we  
12 will bound those in a way that we believe can be  
13 incorporated in to the reload validation check list  
14 and the tech specs in the future. The fuel rod  
15 design, we will not apply this to all cladding types  
16 and all rod designs. It will be a select subset that  
17 will be licensed to meet these criteria.

18 And then broadly speaking, there will be  
19 conservatism included to envelope this in the future,  
20 so avoid to coming back to re-look at this again. And  
21 so this results in a different ECCS analysis for each  
22 in Triple S configuration, two loop, three loop, and  
23 four loop.

24 And we already talked about the burn-up  
25 performance, so transient fission gas, re-burst,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 relocation, and justification for the material  
2 performance will be included in the methodology  
3 updates.

4 The cladding rupture is existing, cladding  
5 rupture models today. And so those will be extended  
6 with measurement as justification to high burn-up  
7 conditions. And all this information will be part of  
8 the topical as a list of requirements that are  
9 required to demonstrate applicability.

10 So the utility can say, yes, I've got this  
11 fuel, yes, I have this ECCS injection rate, you know,  
12 yes, I'm willing to operate within these COLA limits,  
13 et cetera. So they can easily say, yeah, this applies  
14 to me. And therefore the conclusions apply to me.

15 CHAIR BALLINGER: Okay.

16 MR. SMITH: So, you know, we talked this  
17 morning about the LBB specs. And sort of just as a  
18 reminder, so there's a 72-hour LCO, so every three  
19 days at least, and I think in practice it's really  
20 almost a semi-continuous thing. But at a very  
21 minimum, every three days you expect compliance  
22 surveillance on undetectable leakage exceed the 1 gpm  
23 limit, then you have to be in Mode 5 in 36 hours.

24 So what's real important to me from this  
25 perspective is if you compare this to the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 approximately 100 days between detectible leakage and  
2 burst, then the likelihood of operating staff,  
3 multiple operating staffs and multiple conclusions  
4 using, you know, highly trained operators in specific  
5 procedures, missing this is virtually infinitesimal.

6 So we're not planning on doing it in the  
7 reliability analysis, but if we were it would score  
8 out at a probability below the lowest level of human  
9 reliability, I mean, the highest level of reliability,  
10 but it would be below ten to the minus six. So that  
11 could be convoluted with, really, the LOCA initiation  
12 frequency. So, this becomes a really incredibly  
13 improbable event.

14 MEMBER MARCH-LEUBA: And remind me, is  
15 Mode 5 depressurized? Mode 5, is it depressurized?

16 MR. SMITH: It's cold shutdown, below 200  
17 degrees Fahrenheit.

18 MEMBER MARCH-LEUBA: Pressure? What  
19 pressure?

20 MR. SMITH: It depends upon the reactor,  
21 but it's slightly above atmosphere.

22 MEMBER MARCH-LEUBA: Yeah. So,  
23 depressurized?

24 MR. SMITH: Yeah.

25 MEMBER MARCH-LEUBA: So, what other force

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 you have to break up, continue to break, it won't be  
2 there.

3 MR. SMITH: Yeah, that's right. So, as we  
4 said before, the motive force is gone. And of course,  
5 if you have an unidentified leak, you're in there to  
6 find it and fix it. And so, you're not going to  
7 continue to be pressured.

8 Next slide, please. Yeah, so as I said  
9 before, all BWRs have licensed at least the hot and  
10 cold leg for LBB, and many have gone to below the 1  
11 gpm. And so this relatively long period using  
12 statistically conservative evaluation of the analysis  
13 results provides a large amount of temporal margin to  
14 any clad piping rupture.

15 And we already talked about motive force.  
16 And then, of course, it's not really credible that you  
17 could go from a 200 degree Fahrenheit or 100 degree  
18 Centigrade without temperature with the decay heat  
19 loads that would be present after 100 days to anywhere  
20 close to, you know, 600, 700 degrees C. So you have  
21 no clad rupture.

22 Next slide, please. Yeah. So one point  
23 here that, you know, this is essentially the condition  
24 that you're in at the very end of long term cooling.  
25 And so if you had a LOCA, however you have it, we

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 don't know, but if you did have a LOCA, you know,  
2 essentially you're going to drain the top of the  
3 vessel. And you're going to have a big mess on your  
4 hands.

5 But you're not going to expect that you're  
6 going to uncover fuel in the RHR capacity to make up.  
7 Any steam generation is a small fraction of one side  
8 of the RHR system. And so you're going to just sit  
9 there, kind of like an outage almost. And so any of  
10 the consequences of a LOCA, such as the challenge to  
11 equipment qualification, environment qualification,  
12 radiological release, won't be present in this kind of  
13 scenario.

14 MEMBER MARCH-LEUBA: And the other  
15 argument is that seismic -- the design basis  
16 earthquake, will not break a good pipe. The pipe has  
17 to be already broken, or there is no possibility that  
18 an earthquake would cause the one, you know, the break  
19 that we always assume.

20 MR. SMITH: Yeah. It has to be damaged,  
21 as we talked about earlier.

22 MEMBER MARCH-LEUBA: I know.

23 MR. SMITH: Yeah.

24 MEMBER MARCH-LEUBA: That's what you have  
25 to convince us of the -- and we always have the frame

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 of mind.

2 MR. SMITH: Yeah.

3 MEMBER MARCH-LEUBA: Of course there's the  
4 LOCA, the earthquake, not any safety and --

5 MR. SMITH: Yeah. I understood. I was  
6 listening very carefully to those questions.

7 MEMBER MARCH-LEUBA: Yeah. That's an  
8 argument that needs to be done very -- with ten to the  
9 minus six probability.

10 MR. SMITH: Okay, yeah. So for defense in  
11 depth considerations, this is another key point. So  
12 LBB applications don't explicitly consider defense in  
13 depth. This is somewhat implicitly, I believe. And  
14 they certainly don't, you know -- and this is out of  
15 the LBB federal register that the substantial range  
16 of pipe crack sizes are stable for an extended period  
17 of time.

18 And so this is what supports the ability  
19 to detect leaks. There's not a cliff effect. And the  
20 probability of rupture is extremely small. So that's  
21 already kind of in the framework when you say LBB.

22 For defense in depth considerations, the  
23 only thing that exists, really, is the very  
24 conservative assumptions in the deterministic fracture  
25 mechanics. And so when you make those assumptions,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 you're defending at every line the capacity of the  
2 piping system to withstand a rupture. So there's a  
3 degree of defense in depth in the original licensing  
4 of those.

5 xLPR takes a very different approach in  
6 that it is using a whole range of probability  
7 distributions, and sampling those probability  
8 distributions, and then we're drawing a NAIFA line on  
9 the limit. And so, I would contend that those have an  
10 equivalent function. And so many elements of defense  
11 in depth are built into the xLPR analysis methods.

12 (Simultaneous Speaking.)

13 MEMBER DIMITRIJEVIC: What are the safety  
14 margins? You know, you have two things to address,  
15 safety margins and defense in depth. And all of  
16 those, conservatively, falls in category of the safety  
17 margins, you know.

18 MR. SMITH: Yes, that's right. And, you  
19 know, we'll have to address those, but I think the two  
20 principal arguments are that you've lost the motive  
21 force, and so a credible earthquake, I mean, a  
22 credible rupture isn't going to happen.

23 You have large amounts of time margin.  
24 So if we take this 3.8 months of time margin and, you  
25 know, cut it in half, cut it in three-quarters, you

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 still wind up with the same assumption. So there's  
2 large amounts of margin in that result that can  
3 accommodate many, many potential challenges.

4 So next slide, please.

5 MEMBER KIRCHNER: Fred, this is Walt  
6 again. Could you just refresh our memory, or at least  
7 mine, on what the typical in-service inspection  
8 intervals are for the primary coolant boundary?

9 MR. SMITH: I'll ask my piping experts to  
10 answer that. I don't really know.

11 MR. BURKHARDT: So, the typical in-service  
12 inspection?

13 MR. SMITH: Yeah, okay.

14 MR. BURKHARDT: The microphone's right  
15 here.

16 MR. SMITH: Yeah.

17 (Simultaneous Speaking.)

18 MR. BURKHARDT: So, this is Markus  
19 Burkhardt at DEI. In-service inspection intervals  
20 depend based on the specific component and  
21 temperature. But they're typically in the every  
22 couple of years to every ten years for things that are  
23 hot lag or cold lag temperature. Mitigating  
24 components are sometimes, on a sample basis, a little  
25 bit less frequent than that. And components at

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 pressurizer temperature are more frequent than that,  
2 to your point.

3 MEMBER KIRCHNER: No, I was just thinking  
4 that you can use the ISI as a defense in depth  
5 argument to bolster your case.

6 MR. BURKHARDT: Yeah, that's --

7 MEMBER KIRCHNER: To look for what I would  
8 be looking for is something beyond, you know, a small  
9 incipient crack or something, some obvious indication  
10 of something, either in the environment that the  
11 piping is exposed to or something else, other factors  
12 that might lead to a more significant leak problem or  
13 probability of a leak.

14 MR. BURKHARDT: Yeah, thank you for that  
15 feedback. I think discussing the conservatisms built  
16 into the ISI program is another layer of events.

17 CHAIR BALLINGER: Division 2, Section 11,  
18 Division 2 was written not for LWRs, but is it useful  
19 here?

20 MR. SMITH: I don't know. I would have to  
21 look at that. I'm not familiar with it.

22 CHAIR BALLINGER: Because it allows  
23 probabilistic identification of things.

24 MR. SMITH: Yeah.

25 MR. HARRINGTON: This is Craig. It may

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 be useful, but I don't know that anybody's going to  
2 apply it.

3 MR. SMITH: Okay, well --

4 MR. HARRINGTON: You know, it could be,  
5 but everybody, all the existing fleet operate under  
6 Division 1, well established ISI programs. They do  
7 monitor it for those things just described. So it's  
8 really their intent.

9 MR. SMITH: Okay. So I've talked about  
10 this a little bit, but this is a cartoon just to  
11 illustrate the, you know, response from a plant  
12 operation staff.

13 And so, again, we talked about the large  
14 time margin between consequences. And the shutdown  
15 of the plant is being performed by highly qualified,  
16 trained operating staff, proceduralized processes. In  
17 many cases it's automated, and they're independently  
18 reviewed. And so the human reliability opportunities  
19 are relatively low.

20 And then the cartoon on the right shows we  
21 have a diverse set of indicators. And so we're not  
22 relying upon one single parameter to detect slow  
23 leakage. And so we have multiple means of getting  
24 feedback. We may have something that's not understood  
25 or anticipated.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 Next slide, please.

2 CHAIR BALLINGER: So this is a lot more  
3 than addressing FFRD. This is a huge change in the  
4 way you address LOCA.

5 MR. SMITH: Yeah, so --

6 CHAIR BALLINGER: The FFRD is kind going  
7 along for the ride here, I think. Ha, ha, ha.

8 MR. SMITH: Well --

9 CHAIR BALLINGER: I mean, this is --

10 MR. SMITH: So my friend Al Santos is  
11 here. And so there's a potential, certainly a  
12 potential interest in that kind of change. The scope  
13 of our topical report is limited just to FFRD and so  
14 -- but yes, it does kind of set up a framework that  
15 maybe there could be a change to fully risk inform  
16 large-break LOCA in the future.

17 MEMBER KIRCHNER: So, Fred, this is Walt  
18 again. Ron asked a question earlier in one of the  
19 presentations about the long pole in the tent. Does  
20 rod ejection then become the long pole in your tent in  
21 going to LEU+ and high burn-up?

22 MR. SMITH: Well, it's something that  
23 needs to be addressed, you know, the full spectrum of  
24 accidents, fuel handling. Fuel handling may be  
25 surprisingly fuel assembly drop, it's also called, can

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 be surprisingly difficult, or ejection as well.

2 One of the big differences was rod  
3 ejection, as it's a very local event in that it's  
4 going to only cause failure in a relatively small part  
5 of the core. And so it's different from that  
6 perspective.

7 MEMBER REMPE: The approach is different  
8 somewhat, but is it so different than what was done  
9 with GSI-191 for a lot of plants, to investigate for  
10 why they didn't have to -- they could address it?

11 MR. SMITH: That's right.

12 MEMBER REMPE: And so I don't, you know,  
13 I applaud your work, but I don't think it's just --  
14 this is so different that we haven't --

15 MR. SMITH: Well, remember that --

16 MEMBER REMPE: -- the application was  
17 successful.

18 MR. SMITH: Similarly, the transition  
19 break size rulemaking almost went through, but they  
20 failed to identify enough benefits.

21 MEMBER REMPE: Yeah.

22 MR. SANTOS: Can I add onto that?

23 MR. SMITH: Sure.

24 MR. SANTOS: Fred just said -- I heard  
25 what you said, Ron, and I heard some other comments as

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 well. Oh, this is Al Santos from NEI. And, you know,  
2 what Fred is doing here with the ALS approach is  
3 really, almost you want to call it an offshoot of the  
4 5046 Alpha rulemaking that was initiated back in 2010,  
5 and it was discontinued in 2016 from the staff, where  
6 it was a risk informed LOCA activity.

7           They used it when -- Fred was talking  
8 about the transition break size which was looking at  
9 this criteria where you could change some of the  
10 design criteria based upon -- or minimize, you know,  
11 some of the issues, and I won't go into that, but  
12 going into the smaller break sizes up to the  
13 transition break size. That was, you know, calculated  
14 through a reg guide that was proposed in that  
15 rulemaking.

16           What Fred is doing here is really updating  
17 that type of approach to the modern fracture  
18 mechanics, probabilistic fracture mechanics tools that  
19 we have here, and focusing it to a specific  
20 application.

21           So I think that, like you said, Ron, this  
22 has got other places that it could be very useful.  
23 But for the short term and what the utilities are  
24 looking for, this is a specific, targeted application  
25 to see how we could use this risk informed LOCA

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 approach going forward.

2 (Simultaneous Speaking.)

3 MR. SANTOS: Yeah, go ahead.

4 MR. SMITH: So one of the areas that we  
5 haven't talked about is that, you know, we're doing  
6 LOCA analysis for piping systems and addressing  
7 large-break, but there are other potential failures  
8 that could result in a LOCA. And so we're going to be  
9 reviewing all those.

10 And, of course, the easiest ones are pipes  
11 that will result in a LOCA that's smaller than the  
12 deterministic analysis that we're doing. And there  
13 are some larger systems like a steam generator,  
14 manways that have been historically addressed based on  
15 some fracture mechanics and some measurements.

16 And we're reviewing those and going to  
17 provide justification for why the probability of those  
18 rupturing and causing a LOCA is acceptably small. And  
19 then there's also the potential that you could have  
20 active component failures that could result in a loss  
21 of coolant.

22 MEMBER HALNON: But how do you reconcile  
23 the Davis-Besse event with what you just said?

24 MR. SMITH: Well, that's something that,  
25 you know, certainly the Davis-Besse event was

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 extremely unfortunate and --

2 MEMBER HALNON: In many ways.

3 MR. SMITH: Yes, in many ways. And it is,  
4 at the very least, as a former utility person, it  
5 violates almost all the standards that we were  
6 upholding.

7 MEMBER HALNON: So that's a one-off --

8 MR. SMITH: Well --

9 MEMBER HALNON: -- isolated point  
10 somewhere that we --

11 MR. SMITH: We can certainly hope so.

12 MEMBER HALNON: But notwithstanding all  
13 the causes of the event itself, it did show that human  
14 error, I guess, is the best way to put it.

15 MR. SMITH: Multiple cultural breakdowns.

16 MEMBER HALNON: Yeah. It could cause the  
17 problems here. I mean, it was demonstrated that it  
18 did. It wasn't theoretical.

19 MR. SMITH: No, I understand. And I'm  
20 trying hard not to try to justify it.

21 (Simultaneous Speaking.)

22 MEMBER HALNON: -- the employees. So you  
23 can't offend me.

24 (Simultaneous Speaking.)

25 MR. SMITH: Yeah.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER HALNON: I wasn't there during the  
2 event. But I was the first energy survey.

3 MR. SMITH: Yeah.

4 MEMBER HALNON: So, don't worry about  
5 hurting my feelings.

6 MR. SMITH: No, I wasn't worried about  
7 that. But the --

8 MEMBER HALNON: I brought it up.

9 MR. SMITH: -- the methods of detection  
10 that we showed on the other slide is what --

11 MEMBER HALNON: Okay.

12 (Simultaneous Speaking.)

13 MR. SMITH: -- allowed them to detect --

14 MEMBER HALNON: Right, so --

15 MR. SMITH: -- the event.

16 MEMBER HALNON: The leakage was much less  
17 than one gallon per minute.

18 MR. SMITH: Well, there's that, but there  
19 was radiological evidence.

20 MEMBER HALNON: There was a lot of  
21 look-back and --

22 MR. SMITH: Yeah.

23 MEMBER HALNON: Yeah, I understand that.  
24 And so basically that event set up the preconditions  
25 that you're talking about here, basically.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. SMITH: Right.

2 MEMBER HALNON: We strengthened our  
3 pre-screening. And if we --

4 MR. SMITH: If I thought this was going to  
5 be a recurring event, I think there would be a lot of  
6 other things to talk about.

7 MEMBER HALNON: We'll go with that, yeah.

8 MR. SMITH: So I would just highlight that  
9 if the control rod drives had been injected that would  
10 be much less than the LOCA event that we are  
11 analyzing. And so that would still be covered.

12 MEMBER HALNON: Okay.

13 MR. SMITH: Next slide, please. So just  
14 as background, we have been talking with the staff on  
15 this in a number of forms. So we wrote an initial  
16 draft approach on this. And we have since refined  
17 that. So it's there, you can look it up. But it's  
18 not really what we're doing today. So that's just  
19 included for completeness.

20 We've had two xLPR public meetings the  
21 with staff, most recent one in January. The ALS, we  
22 presented ALS to the NRC several times including last  
23 August at their high burn-up workshop. And then right  
24 after that we had a pre-submittal meeting, and had  
25 some good, hard questions but some general, reasonable

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 feedback at the results encouraging us to be  
2 persistent but be prepared. And so that's what we've  
3 been working on doing.

4 And we meet with them every quarter to  
5 update. We were very anxious to hear what their first  
6 phase of the rulemaking provides. And so we expect to  
7 respond to that as appropriate.

8 Next slide. So safety benefits, so high  
9 burn-up does produce a lot of potential safety  
10 benefits. So high burn-up would, in broad terms, just  
11 as a rule of thumb, we expect to reduce the reload  
12 requirements by 20 percent and, therefore, the  
13 back-end requirements by about the same amount. Of  
14 course, that varies by plant design, but that's just  
15 kind of a rule of thumb.

16 And so the risk of transportation across  
17 the entire fuel cycle is reduced. The risk of fuel  
18 handling in the plant due to reload, smaller vat size,  
19 is reduced. High level waste, this is a very  
20 substantial benefit to me, but the amount of high  
21 level waste that you have to store at the site, load  
22 into the dry cast, eventually transport it to a  
23 repository --

24 MEMBER MARCH-LEUBA: Are you 100 percent  
25 sure about that? You know, high level waste is the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 outcome of the power times time. That's how many  
2 isotopes you produce. You just concentrated more in  
3 high burn-up fuel. It's more dense. So in a sense,  
4 I want to ask you, when you come in, are you hitting  
5 your dry cask, because you're packing more use into  
6 it.

7 MR. SMITH: Well, certainly the atoms are  
8 somewhat similar, but you're also burning some, and  
9 you've got fewer packages.

10 MEMBER MARCH-LEUBA: Again, it's more  
11 concentrated.

12 MR. SMITH: That's right. So if you have  
13 an accident, you have --

14 (Simultaneous Speaking.)

15 MEMBER MARCH-LEUBA: Is it concentrated  
16 enough to cause some -- well, I know you have some  
17 heat load in your dry cask. You put high burn-up  
18 fuel, the heat load will be higher.

19 MR. SMITH: Well --

20 MEMBER MARCH-LEUBA: It's not going to be  
21 lower.

22 MR. SMITH: Not necessarily. So, yeah,  
23 we'll talk about that later, but the heat load is --

24 MEMBER MARCH-LEUBA: Somebody is out there  
25 --

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. SMITH: Well, that is one of the  
2 topics that's in one of my presentations a little bit  
3 later. So we can --

4 MEMBER MARCH-LEUBA: We'll defer to you.

5 MR. SMITH: We can table that until we get  
6 to that.

7 MEMBER MARCH-LEUBA: Sure.

8 MR. SMITH: Okay. So where was I, here.  
9 So economic performance sites that are at risk of  
10 early shutdown because of their economic performance,  
11 this provides some tangible economic benefits that  
12 would allow them to continue to operate and continue  
13 to support U.S. and international environmental goals  
14 and Green House emissions.

15 Core design efficiency reduces the uranium  
16 requirements and the effect on the environmental and  
17 radiological impact for the whole fuel cycle. And  
18 this has been proven for all of the previous burn-up  
19 upgrades. Staff is in the process of doing the  
20 environmental evaluation for this. And there's no  
21 reason to expect they wouldn't have the same  
22 conclusion.

23 Longer high burn-up fuel enables longer  
24 fuel cycles, so there's fewer outages, lower outage  
25 risk, and less personnel dose, because they're not in

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 an outage which is a major source of personnel dose.

2 And then last but not least, because we  
3 are precluding burst, there are any number of  
4 phenomenon that we would not have to develop models,  
5 and do research for, and tie up industry, personnel in  
6 the NRC, personnel in designing, I mean, evaluating  
7 those models and phenomenon. So that contributes to  
8 the overall effective use of scarce resources.

9 So this is kind of what the submittal  
10 looks like in cartoon form. So we will have a topical  
11 report in blue. It's on the left side. And  
12 supporting that would be an xLPR analysis that you've  
13 heard about today as well as vendor-specific LOCA  
14 application reports.

15 The methodology, the vendors will hold  
16 that as proprietary, and so they will submit that  
17 separately in coordination with this report. And  
18 then, as I said before, there will be a application  
19 section that will allow the utility a clear path to  
20 adopt this.

21 And so in summary, we're going to do  
22 deterministic, small, intermediate-break LOCA, apply  
23 LBB to the large-break LOCA, and then address  
24 non-piping ruptures. And the plan is to submit this  
25 before the end of this year, between the end of this

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 year and the end of the first quarter of next year.

2 MEMBER HALNON: Fred, could you just  
3 summarize? After you said the utility can adopt this,  
4 what do they -- summarize what the benefits to them  
5 will be.

6 MR. SMITH: To doing this?

7 MEMBER HALNON: Yeah.

8 MR. SMITH: Well --

9 MEMBER HALNON: I mean, it's a big deal.  
10 You have to put the license -- I mean, it costs money,  
11 and a lot of time, and stuff.

12 MR. SMITH: So when you compare it to a  
13 fully deterministic approach, there is fair amount of  
14 research that's ongoing, the tree test. I know Joy  
15 can tell you about the governor of Idaho allowing the  
16 lease of environment rods into the state of Idaho.  
17 It's been, I don't know, ten years maybe. So those  
18 tests will begin sometime next year.

19 There are other phenomenon tests that  
20 we're working on. And so I don't have a crystal ball  
21 on how long that backup would take. But it wouldn't  
22 be unreasonable to say that it would be another five  
23 years.

24 MEMBER HALNON: Well, but practically, are  
25 they going to be able to expand their PT curves as

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 they're --

2 MR. SMITH: Well --

3 MEMBER HALNON: -- what physical benefits  
4 to an operating control room will this provide?

5 MR. SMITH: So obviously when you improve  
6 the -- reduce the vat size and improve the efficiency,  
7 you're going to reduce the leakage. And so that gives  
8 you the opportunity to either stretch out PT curves in  
9 time or to revise them in a more favorable way so  
10 you'd have less neutron leakage.

11 MEMBER HALNON: So you're -- license  
12 renewal will be easier to get to, you know, even  
13 beyond the --

14 MR. SMITH: Those are all potential --

15 MEMBER HALNON: But we're setting  
16 ourselves up, yeah, longer running, lower leakage  
17 plant. But the control room operator really --

18 MR. SMITH: We would like him to not know  
19 that --

20 MEMBER HALNON: Not have to worry. That  
21 helps, thanks.

22 MR. SMITH: Okay.

23 CHAIR BALLINGER: So probably a dumb  
24 question, I'm pretty good at them. Who owns xLPR?

25 MR. SMITH: It's jointly owned by the NRC

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 and EPRI, I believe.

2 CHAIR BALLINGER: That's what I thought.

3 MR. SMITH: Yeah.

4 CHAIR BALLINGER: So now you have the  
5 industry using xLPR. And the staff is going to use  
6 the same xLPR, the same code to check the industry's  
7 use of xLPR?

8 MR. SMITH: Well, perhaps.

9 CHAIR BALLINGER: Well, there's no other  
10 code that's going to do that.

11 MR. SMITH: That's true. Craig, if you  
12 want to --

13 MR. HARRINGTON: This is Craig. That was  
14 actually one of the intentions in jointly developing  
15 the code, is then we're in a position where we're  
16 arguing over the details of the application of the  
17 code as opposed to arguing over what's in the code.  
18 And a probabilistic code is such a big black box, you  
19 could spend all your time arguing over what's inside  
20 the box. And, you know, both groups very aggressively  
21 worked to make sure that the things in the box were to  
22 the best of our ability to represent reality.

23 MEMBER MARCH-LEUBA: Yeah, that's the  
24 definition of conflict of interest.

25 MEMBER REMPE: That's not the, actually,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 that's not the only application. Your SCALE code from  
2 Oak Ridge is a good example. And we've had a design  
3 certification where both the applicant and the NRC  
4 used MELCOR. And then they argued about the input and  
5 how they, you know, did the novelizations, like --

6 MEMBER MARCH-LEUBA: The point is --

7 MEMBER REMPE: -- I can tell you, I know  
8 that it's not the first time.

9 MR. HARRINGTON: -- is the same way.

10 MEMBER MARCH-LEUBA: Yeah, there's --

11 (Simultaneous Speaking.)

12 MEMBER MARCH-LEUBA: -- that has been done  
13 in other applications doesn't mean that you are in  
14 love with your code. And IS and NRC review it, I  
15 mean, all with the same code. And we're looking with  
16 bankers' eye shields. So during the review, they have  
17 to be careful about that bias. The engineers fall in  
18 love with their methodology.

19 MR. SMITH: Yeah. But there are many  
20 other, I mean, the first term change in Reg Guide  
21 1.183, it's owned -- tallied by the NRC. There's very  
22 little capacity in the industry to do those kind of  
23 calculations. So that's the opposite.

24 PARTICIPANT: After the stupid question.

25 MEMBER KIRCHNER: Fred, this is Walt

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 again. Could you address your middle bullet there?  
2 By component bodies, I'm assuming you're including  
3 valves.

4 MR. SMITH: Yes.

5 MEMBER KIRCHNER: Yeah.

6 (Simultaneous Speaking.)

7 MEMBER KIRCHNER: Is this really a  
8 profitable area for -- I could see manways which could  
9 be quite large. Valves, by and large, may be  
10 bracketed by your deterministic small-break analyses.  
11 I'm just thinking that, you know, valves, say you had  
12 undetected, very small leakage that led to corrosion.  
13 You could have a valve bonnet just blow off. But  
14 trying to develop a database that would justify a  
15 probabilistic approach to that strikes me as tenuous.

16 MR. SMITH: Well, many of these things  
17 have been already addressed in life-extension  
18 applications and have been addressed back in the dark  
19 ages when I was a young engineer. And so we're really  
20 discovering the basis for those. And I don't expect  
21 to do fracture mechanics on valves or research coolant  
22 pumps either. But I'm just --

23 MEMBER KIRCHNER: Well, like you, I'm an  
24 ancient mariner. And I've been on ships where valves  
25 had blown right off the boilers, so admittedly not

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 nuclear but, yeah. I just wonder whether -- I get it  
2 for the primary coolant boundary and piping. It may  
3 prove, just may prove difficult to develop a good  
4 enough database to justify its application to all  
5 these different components. But I'm willing to stand  
6 corrected.

7 MR. SMITH: Well, I think, at least our  
8 plan is that we should be able to disposition all but  
9 a few because of the largest deterministic LOCA is  
10 conservative. And if the valve blows off, then the  
11 choke flow becomes the piping going into the valve.

12 MEMBER KIRCHNER: Exactly --  
13 (Simultaneous Speaking.)

14 MR. SMITH: And the piping is smaller than  
15 the analyzed piping systems, and that dispositions  
16 that.

17 MEMBER KIRCHNER: I was just musing out  
18 loud with you, Fred. Because I'm thinking it's very  
19 elegant what you presented for the primary coolant  
20 piping. But I'm just wondering whether it would be  
21 difficult to apply to individual components.

22 MR. SMITH: Yeah. And I appreciate that.  
23 We are working on that even as I speak. So we don't  
24 have all those questions resolved. But we are  
25 committed to provide a basis for why those components

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 don't pose an undue risk.

2 CHAIR BALLINGER: Okay. So now we are on  
3 Number 7 which is the -- is that the way we're going,  
4 to the atomistic modeling?

5 MR. WELLS: Yeah, we were planning to go  
6 to atomistic modeling, that's seven on the published  
7 agenda, or eight on the published agenda. Yes.

8 So, Erich, are you still on the line,  
9 hopefully? We're pulling up your slides.

10 (Simultaneous Speaking.)

11 MR. WIMMER: Yes, I'm here.

12 MR. WELLS: He is, he's still here.

13 MR. WIMMER: Yes. And how is the audio?  
14 Is it okay?

15 MR. WELLS: Yeah, we can hear you.

16 MR. WIMMER: Okay. Welcome, then. Well,  
17 I really appreciate the opportunity here to present  
18 atomistic modeling here of the cladding coating  
19 behavior. And this is work done for and together with  
20 EPRI. And I wanted to mention right in the beginning  
21 here my colleague Mikael Christensen who did the  
22 really heavy lifting here.

23 Okay. So on the next slide, there is an  
24 outline of the present (Audio interference.)

25 CHAIR BALLINGER: Uh-oh. Now we're

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 running into trouble.

2 MR. WELLS: Erich, your audio is breaking  
3 up. Maybe try just turning off your video, see if  
4 that helps your bandwidth.

5 MR. WIMMER: Okay. I turned off the  
6 video. Is this better now?

7 MR. WELLS: It improved a little bit.  
8 We'll have to see.

9 MR. WIMMER: I'll just double check. Let  
10 me just double check one thing here in the microphone.

11 (Simultaneous Speaking.)

12 MR. WIMMER: Can you hear me okay now?

13 MR. WELLS: It seems to be better. We'll  
14 have to see.

15 MR. WIMMER: Okay. So hopefully that will  
16 work.

17 So I will review first the motivation, the  
18 objectives of this modeling work, and then give the  
19 key results up front, say a few words about the  
20 modeling approaches but then -- and show the results.

21 So one of the key questions we wanted to  
22 ask is chromium coating to zirconium. Is chromium a  
23 barrier or a window for hydrogen? And what is the  
24 bonding between the chromium coating here and the  
25 zirconium substrate? And what happens if you have

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 defects, in particular, through coating defects. And  
2 how does the system respond to mechanical  
3 deformations? And then summarize and provide some  
4 engineering implications.

5 Next slide. It's kind of slow. Can you  
6 give the next slide?

7 MR. WELLS: It did not advance on this  
8 side.

9 MR. WIMMER: Hum.

10 MR. WELLS: We're on key results in the  
11 meeting. Are you not seeing that?

12 MR. WIMMER: I am not seeing that yet.  
13 Okay, so we have a big delay here. Hum.

14 MEMBER REMPE: This is Joy Rempe.

15 (Simultaneous Speaking.)

16 MR. BLEY: -- and it's perfect for me.

17 MEMBER REMPE: So this is Joy. We often  
18 have problems this way. And if you'll, say, go to  
19 Slide 98 out of 224, the folks in the room will do it.  
20 And by the time it gets back to you on the Internet,  
21 it'll be a lot longer. So just know the folks in the  
22 room will take care of it. Okay?

23 MR. WIMMER: All right, good. So if you  
24 see the key results, well, I know what they are, so  
25 it's basically good news. So the chromium of metal,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 as well as a thin layer of chromium oxide to scale, is  
2 a barrier for hydrogen ingress. So that's good news.

3 But then also we see from the simulations  
4 that the bonding between zirconium and the chromium is  
5 very strong. So this chromium coating resists even  
6 strong and large strains and mechanical deformations.

7 And so finally, if you have a through  
8 coating defects then we were concerned about that the  
9 corrosion will then set in at the boundary between  
10 chromium and zirconium and thereby lead to  
11 delamination. And this is not the case. So those are  
12 really the key results that we can conclude from these  
13 simulations.

14 Okay. So then a few words, and let's go  
15 to the next slide, Slide Number --

16 (Pause.)

17 MR. WIMMER: -- and do you see actually  
18 the Slide Number 5?

19 MR. WELLS: Yes, we're good.

20 MR. WIMMER: Okay, good. So the  
21 methodologies that are being used are atomistic  
22 simulations on two levels. One is the first principal  
23 is quantum mechanics. And the power of this approach  
24 is that there are no system-specific parameters.

25 That means you have a very high predictive

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 power from thousands and thousands of compilations  
2 that have been done in the community with these  
3 methods. We have a good sense of the error bars. So  
4 we predict thermodynamic mechanical properties and  
5 also interface energies.

6 Then we perform molecular dynamics as  
7 simulations, and that gives us diffusion, plastic  
8 deformation, and behavior of larger defects at these  
9 locations, voids and cracks. And to do this end, we  
10 are using state of the art so called interatomic  
11 potentials derived using machinelearning techniques.

12 So I won't go into details, but it's truly  
13 the state of the art, giving very high fidelity in the  
14 molecular simulations. And the software that we using  
15 here is for the quantum mechanical calculations,  
16 VASPA. And for the dynamic simulation, Landspin,  
17 developed at the Sandia National Lab. And that's all  
18 embedded in a molecular modeling environment that our  
19 company produces and supports they call Media.

20 Okay. Let's then move to Page Number 6.  
21 And that shows the following computational experiment,  
22 if hydrogen atom on the surface, what energy does it  
23 take for this hydrogen to get into the bulk chromium  
24 and then to diffuse into the chromium?

25 The results show very clearly hydrogen

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 does not like to go into chromium metal. So chromium  
2 metal is a barrier. If, on the other hand, hydrogen  
3 would be inside the chromium, it would diffuse  
4 relatively fast.

5 So the barriers for diffusion are low.  
6 But it just doesn't want to go in. So in other words,  
7 the solubility of hydrogen and chromium is very, very  
8 low. So that's why chromium metal is a barrier.

9 Okay. So on the next slide, now on Page  
10 Number 7, we see the same question being asked. Well,  
11 what happens to the chromium oxide? Because we know  
12 that if you expose metallic chromium to an environment  
13 it typically forms a very thin but very nicely  
14 protective chromium oxide scale. So how does hydrogen  
15 behave in that?

16 And the answer here is actually somewhat  
17 different. It can go in with a modest barrier. But  
18 then inside it has great difficulties to diffuse. So  
19 it really gets blocked and trapped inside. So yet for  
20 a different reason, chromia is also a barrier. So  
21 both chromium metal and chromia are barriers for  
22 hydrogen ingress. Very good news.

23 Moving on to Page Number 8, so how is the  
24 bonding between chromium coating and zirconium? And  
25 again, that's a computational experiment. We simply

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 place chromium onto the zirconium metal from an  
2 interface and then pull it apart.

3 And what actually happens is that the  
4 interface does not break between the top zirconium  
5 layer and top chromium layer, but it breaks inside the  
6 zirconium such that, at the end of this separation,  
7 you have one monolayer of zirconium atoms attached to  
8 the chromium coating.

9 So it can quantify that the work of  
10 separation of the chromium coating from zirconium is  
11 2.62 joule per square meters. And for comparison, if  
12 you would take bulk zirconium and just cleve it, that  
13 will cost you 3.2 to the square meter. So in other  
14 words, the bonding between chromium and zirconium is  
15 really quite strong.

16 Okay. Now moving on Page Number 9,  
17 hopefully we'll see that.

18 CHAIR BALLINGER: This is Ron Ballinger.  
19 You're talking about a basal plane --

20 MR. WIMMER: That is correct, yeah.

21 CHAIR BALLINGER: -- in the zirconium.  
22 But we know that the cladding primarily has about a  
23 plus or minus 30 or 40 degree texture. And not only  
24 is it a 30 or 40 degree texture, but the pilgering or  
25 the process of making the tubing results in sort of a

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 helical pattern on the cladding. So you're not really  
2 talking about a basal texture that's sticking out.

3 MR. WIMMER: Yes. And that's a very good  
4 question. In fact, when we carried out the project  
5 later Rob Baum exactly mentioned that. So then you  
6 will see later on simulation that where the basal pole  
7 is tilted by 30 degrees, and then we looked at what  
8 happens.

9 CHAIR BALLINGER: Thanks.

10 MR. WIMMER: But basically this chemical  
11 bonding between zirconium and chromium is, to some  
12 extent, independent of the crystalline orientation.  
13 So it's very local but, of course, it's a very good  
14 point. And yes, we did address exactly this issue.  
15 Because the surface of the cladding is not to be the  
16 basal plane itself, but it's tilted to a granular, a  
17 grain structure, of course. Yeah. But, I mean, those  
18 are models that give you a sense of what is the  
19 bonding here. And, of course, you make in this kind  
20 of model some simplifications.

21 So now we ask the question what about the  
22 chromia scale being attached to the chromium surface?  
23 How strong is that bonding. And again, we do the same  
24 computational experiment. You know, we create the  
25 interface, again, using the basal plane, that's true,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 to pull it apart.

2 And again, the bonding is very strong. So  
3 in other words, the chromia scale sticks very, very  
4 tightly to the chromium metal. And that is also, of  
5 course, good news.

6 So moving on to the question of, kind of,  
7 the response to mechanical deformations, and hopefully  
8 that we'll see this soon.

9 Okay, no, first the, sorry, first the  
10 issue about what happens if you have a through coating  
11 defect? Then, of course, the coolant gets access to  
12 both the chromium but also the underlying zirconium.

13 And what that leads to a situation where  
14 the interface between chromium, zirconium starts  
15 attracting oxygen and hydrogen, which is the product  
16 of the disassociation of water, and thereby  
17 destabilized and ultimately lead to delamination.

18 Or would the oxygen and hydrogen that's  
19 being produced by the dissociation of water actually  
20 diffuse into zirconium? That will be Scenario B. And  
21 the calculations very clearly show its Scenario B that  
22 actually takes place. And it's much more likely.

23 So there is no preference really for  
24 oxygen, hydrogen to accumulate in the zirconium,  
25 chromium interface or perhaps precipitate oxides or

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 zirconium hydrides which will be detrimental.

2 So again, through coating defects probably  
3 remain kind of localized and don't lead to a spread  
4 out of this defect which, again, is good news.

5 MEMBER KIRCHNER: Erich, this is Walt  
6 Kirchner.

7 MR. WIMMER: Yes?

8 MEMBER KIRCHNER: Did you look at this  
9 phenomenon under different thermal conditions?

10 MR. WIMMER: That's what --

11 MEMBER KIRCHNER: In other words, with the  
12 zircaloy, the chrome zircaloy at temperatures that you  
13 would normally see in a PWR when you have sub-cooling  
14 nuclear at boiling.

15 MR. WIMMER: Yes. Now what happens is  
16 that, of course, the diffusion rate changes, and it  
17 depends strongly on temperature. And we do have  
18 explicit expression for temperature dependent  
19 diffusion coefficients of oxygen and hydrogen in  
20 zirconium. Also the reaction rate itself is  
21 temperature dependent.

22 But the mechanism itself of oxidation at  
23 the boundary and diffusion into the bulk is, well, the  
24 timescale, the rate changes, but the overall mechanism  
25 remains the same. So while we did not explicitly do

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 a temperature dependent simulation, under operating  
2 conditions you will probably see exactly the same  
3 behavior. But it's a good point, yes.

4 Does this answer your question?

5 MEMBER KIRCHNER: Yes, thank you. Yeah,  
6 I was thinking that the interface may be a little bit  
7 more prone to attack under, you know, operating  
8 conditions versus just, you know, after it's been  
9 manufactured.

10 MR. WIMMER: Yes. I mean, it's of course  
11 the interface. When it's manufactured, A, as we say  
12 it, zirconium, it has a texture, it has a grain  
13 structure that are tilted, and you have grain  
14 boundaries. It's much more complex. But the overall  
15 mechanism, I think, that's indicated here, and  
16 resulting from the simulation, is credible.

17 And, of course, with increasing  
18 temperature things go faster in an exponential way so,  
19 of course, the speed of the reaction changes but not  
20 fundamentally the mechanism.

21 MEMBER KIRCHNER: Thank you.

22 MR. WIMMER: Okay, great. Well, let's  
23 move on to Page 11. Now it gets exciting, because  
24 hopefully you can see some movies. What we're doing  
25 here is we are now deforming molecular dynamic

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 simulation at the 600 K.

2 So now the temperature is explicitly taken  
3 into account. And so that's approximately normal  
4 operating conditions. And now we apply a strain  
5 perpendicular to the interface, and you see how it  
6 breaks. Well, again, it's the same situation that  
7 after the breakage, one layer of zirconium remains  
8 stuck to the chromium overlayer.

9 Okay. So now let's move on to a case  
10 where the strain is not perpendicular, so you have to  
11 just delaminate it by pulling it apart, but rather  
12 lateral, so parallel. And that could be in the case  
13 of ballooning or simply thermal expansion of the  
14 substrate.

15 And now what you see is that, of course,  
16 you have first an elastic domain. Then you get a  
17 plastic deformation, and you activate slip planes.  
18 But you see very nicely that the chromium just really  
19 hangs on to the zirconium surface. Eventually, of  
20 course, it breaks, opens up and exposes the zirconium  
21 substrate. So again, even under very extreme strain,  
22 the chromium coating remains basically intact until,  
23 of course, you expose it.

24 So then, yes, if we now have, for example,  
25 a grain boundary or small crack in the chromium

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 coating, and we deform at the same simulation, maybe  
2 you can start the dissimulation. But I'm glad it  
3 worked. That is beautiful.

4 Do you see it okay, in the room?

5 MEMBER REMPE: Yes.

6 Mr. Bley: Yep.

7 MR. WIMMER: Okay. So now, of course, the  
8 zirconium substrate is exposed right from the  
9 beginning. Then that's a weak spot. And you see the  
10 formation of kind of a pit in the zirconium.

11 Now that's not so good news, because that  
12 may simply lead to some greater exposure of the  
13 zirconium substrate if you had these kind of defects  
14 in the chromium coating. But again, those strains are  
15 enormous, and you will probably see them only when you  
16 have extreme ballooning here or other effects like  
17 that.

18 All right. Moving on, if in the  
19 manufacturing you would have voids between the  
20 zirconium substrate and the coating, and those are  
21 just the beginning of the end of several snapshots, so  
22 not from animation.

23 But what you see is that if you had voids  
24 in the interface from manufacturing, they could grow  
25 to fairly substantial voids under strain. But then

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 again, the remaining part of the chromium coating  
2 really sticks up there to the zirconium substrate.  
3 And under this 30 percent strain, which is enormous,  
4 you get these kind of enhanced voids and perhaps this  
5 kind of pitting. But overall, this defect remains  
6 essentially local.

7 Okay. On Page 15 we address exactly what  
8 you said earlier, namely Rob Baum, who sadly left us  
9 not too long ago, but he pointed out, he said what  
10 happens if you actually include a tilt in the  
11 substrate?

12 And fundamentally, I guess, some subtle  
13 differences but overall the picture remains the same,  
14 that under strain the chromium coating adheres to the  
15 zirconium substrate. And eventually you expose a  
16 piece of zirconium, as we have seen in the more  
17 idealistic case of just the basal plane being coated.  
18 So we investigated that question, but it fundamentally  
19 does not change the conclusions.

20 And then on the next page we looked at the  
21 possibility that, of course, we know that zirconium  
22 and chromium does form an intermetallic laves phase  
23 which is more brittle. It's no longer cubic. And so  
24 what happens if you have such an intermetallic phase  
25 at the boundary?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And again the simulations indicate that  
2           you have on the top row the case with the zirconium,  
3           chromium intermetallic precipitate and the bottom row  
4           without. And you see that fundamentally it remains  
5           the same except that the system starts to break also  
6           inside of the zirconium, chromium to intermetallic  
7           which is more brittle. And this is kind of what you  
8           expect. But the presence of zirconium, chromium to  
9           intermetallic -- if it ever occurs, would not  
10          be a disaster.

11           Okay. Now on Page 17 we can now draw some  
12          conclusions. And we did many more simulations also of  
13          the influence of niobium and other elements. But  
14          overall from these simulations we can conclude that  
15          chromium coatings on the cladding of PWRs, as we know,  
16          it works under non-oxidizing conditions.

17           Actually, these simulations did not reveal  
18          any kind of red flags. Furthermore, the chromium  
19          itself oxidizes to a less extent and less rapidly than  
20          zirconium metal. So you get less production of oxide,  
21          less production of hydrogen to begin with.

22           Then both the thin chromia scale and the  
23          chromium metal coating are barriers for hydrogen  
24          ingress. Chromium coating adheres very strongly to  
25          the zirconium surface, through coating defects remain

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 localized, and oxygen, hydrogen atoms created from the  
2 dissociation of water in such a crack, and the through  
3 coating defect, will remain local and not lead to  
4 deterioration of the interface between chromium and  
5 zirconium.

6 And the presence of oxygen on the  
7 zirconium substrate, and I didn't show this  
8 explicitly, but the simulations show also that they  
9 wouldn't be a big problem and, similarly, if you have  
10 niobium dissolve, for example, in niobium containing  
11 alloys.

12 And the second set of summary engineering  
13 applications are on Page 18. We talked about the  
14 presence of precipitate, the tilting of the basal  
15 plane, and the void formation. And so it might  
16 actually be beneficial if initially the chromium  
17 coating is under compressive stress. Because then  
18 when the system expands, and is subject to a tensile  
19 strain, it may even resist better. So that's an  
20 opportunity.

21 Now there are still some concerns. And  
22 that's summarized on Page 19. The assimilations, and  
23 I didn't have time to show that explicitly, but if you  
24 have zirconium hydrides near the interface, they tend  
25 to weaken the chromium zirconium interface.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And given the fact that hydrides tend to  
2 precipitate in the colder parts, that means closer to  
3 the coolant, that could be an issue. The  
4 intermetallics, like these laves phases, may increase  
5 the brittleness of the interface. And pre-existing  
6 voids may lead to this kind of pitting in the exposed  
7 larger areas.

8           Then another concern, clearly, is under  
9 LOCA conditions, if the temperature rises above the  
10 eutectic temperature of the chromium, zirconium  
11 system, well, you basically melt away the chromium,  
12 zirconium. And that eutectic temperature is much  
13 lower than the melting temperature of pure zirconium

14           And, of course, a big issue and  
15 opportunity for modeling, I would say, is what happens  
16 under irradiation, so neutron core irradiation but  
17 also the gamma irradiation. But those are really the  
18 remaining concerns, and I think they're on Page 20.  
19 It provides the acknowledgment, as always in its  
20 projects, that it's a team effort.

21           First of all, I want thank EPRI for the  
22 continued support of this modeling work. I want to  
23 thank all my colleagues at materials design,  
24 especially Clive Freeman, Clint Gallop, Ben Rominisny,  
25 and Walter Walsh.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And so with that, I hope my audio was  
2 okay. And, of course, we'll be happy to answer any  
3 kind of questions. So thank you.

4           CHAIR BALLINGER: Your audio came in great  
5 after we fixed it. Questions from members?

6           MR. WELLS: Okay. So we're going to  
7 change it up on you again a little bit. And we're  
8 going to let Suresh go into the fuel fragmentation  
9 threshold now. That way, we'll wrap up all of those  
10 related topics before we shift --

11          CHAIR BALLINGER: That's probably a --  
12 (Simultaneous Speaking.)

13          CHAIR BALLINGER: -- better path.

14          MR. WELLS: I think we can make it work.  
15 So, Suresh, we have your slides pulled up  
16 in the room if you want to start when you're ready.

17          MR. YAGNIK: Okay, thank you again. Good  
18 afternoon, everybody. Can you hear me okay?

19          MR. WELLS: You're good.

20          MR. YAGNIK: Good, so thank you. I'm glad  
21 to be here, virtually, though.

22                 Please, next slide. So the outline of my  
23 talk is going to be, I'm going to introduce a best  
24 estimate fuel fragmentation threshold that we have  
25 published, then talk about some scoping experimental

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 tests that were done some time ago, and then move on  
2 to some mechanistic studies that we performed on  
3 especially the irradiation that was done under a  
4 bilateral EPRI program called IFA-649, these were  
5 special fuel lists that I will talk about a little  
6 more, and then finally wrap up my discussion with a  
7 summary and future outlook.

8 Next slide, please. So the best estimate  
9 fuel fragmentation threshold is based on, you know,  
10 numerous separate effects tests that, again, I'm going  
11 to talk about.

12 And the Halden IFA-650 series, there were  
13 as many as about 16 integral tests in Halden reactor,  
14 as many of you are, I'm sure, aware, and then the  
15 SCIP-III program which we collaborated to get some  
16 detailed information, as well as the open literature  
17 information that was available to us.

18 And then we evaluated all those taken  
19 together, you know, although there were integral tests  
20 as well as separate effect tests. But interestingly,  
21 they all sort of fell into what we call a best  
22 estimate threshold which is plotted down below here.

23 It's essentially quite intuitive if you  
24 think about it, that if you have -- it's plotting  
25 local temperature versus local burn-up. And if you

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 have a significantly high enough burn-up and high  
2 enough local temperature, you will get fragmentation.  
3 So that's the upper right-hand corner of the L shaped  
4 curve which is the fragmentation threshold.

5 And anything to the left and under, which  
6 is sort of high temperature but low burn-up and very  
7 low temperature at any burn-up, will not fragment. So  
8 that's essentially what we published back in 2015.

9 And again, as I said, it's based on local  
10 burn-up, local temperatures. And therefore it can be  
11 rather easily implemented in any fuel performance code  
12 looking one fuel rod at a time. And we are aware that  
13 it has been used in industry codes, especially the  
14 DOE's work on BISON code.

15 And if you know the threshold, and you  
16 apply it to a single fuel rod, one at a time  
17 throughout the core, you can help assess the mass that  
18 is subject to fragmentation. And this is the key word  
19 here. We don't get into relocation and dispersal, but  
20 just the amount that can be potentially fragmented.  
21 And then therefore it is available for relocation and  
22 dispersal.

23 Next slide, please. So then I move on to  
24 the scoping test. And here's quickly the schematics  
25 of the experimental test. We carried out two

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 different programs. One was based on an induction  
2 heated furnace with very small samples to the left  
3 here, very fast temperature ramps were intentionally  
4 applied on a very small sample, about a million-liter  
5 cube in dimension.

6 And then the fission gas release and  
7 fragmentation was monitored, and the effect of  
8 hydrostatic restraint in the system could be also  
9 monitored. So if we apply very high hydrostatic  
10 pressure in the system, the fragmentation behavior is  
11 interestingly quite impacted as I will show you in my  
12 next slide.

13 To the right here is a laser heating  
14 system. So as we reach the -- and these tests were  
15 done both on LWR irradiated fuel, so we're talking  
16 about irradiated samples at different burn-ups. And  
17 we took the samples, and it was heated to a base  
18 temperature close to the addition temperature and then  
19 pulsed with laser beams on the sample itself, again  
20 very small piece of sample here.

21 And then it monitored how the  
22 fragmentation occurred through the optical window as  
23 well as then, after the test, the optical  
24 metallography or ceramography on the sample was  
25 performed to see how the fragmentation progressed. So

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 these are what I call the defragment scoping tests on  
2 fragmentation done several years ago.

3 Next slide, please. Then based on this  
4 hydrostatic pressure that I mentioned, it became clear  
5 from the scoping test that in a fuel rod, when you  
6 have a strong metallic clad mechanical interaction,  
7 which is a rather complex state of stress, but we  
8 simulated experimentally already hydrostatic  
9 pressures.

10 And you can see on this block here that,  
11 as the pressure increased, the fission gas released,  
12 which is sort of a surrogate for the fragmentation  
13 behavior, especially in a small miniature sample  
14 reduced quite a bit.

15 So one good news was that once you have a  
16 high burn-up and therefore a high pellet clad  
17 mechanical interaction, your fragmentation naturally  
18 gets reduced. This was further confirmed in IFA-659,  
19 a fuel test that we later perform again in France.  
20 This particular data came out of Japan.

21 Next slide, please. So here, a little bit  
22 of background of especially radiation that I mentioned  
23 of IFA-659, UO2 based fuel disc. Because of the  
24 special disc irradiation, rather than a fuel rod  
25 irradiation in the Halden reactor, we were able to get

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 almost homogeneous burn-up and irradiation temperature  
2 across the fuel disc.

3 And each fuel disc was then discharged  
4 with a scram of a test reactor to capture at  
5 temperature, collect in terms of microstructure and  
6 sort of capturing the distribution of the fission gas  
7 bubble at the temperature that it experienced in the  
8 reactor at different levels of burn-up, which included  
9 either no transition to high burn-up structure nor in  
10 region, so to speak, a partial transformation to high  
11 burn-up structure, or full transformation to high  
12 burn-up structure. And I'll elaborate on that a  
13 little later.

14 And this kind of unique sampling which is  
15 then very conducive to do testing in hot cell is not  
16 retrievable in LWR fuel rod, from LWR fuel rod.  
17 Because naturally LWR fuel rods support very steep  
18 temperature gradation, temperature gradients, but not  
19 gradients, I must say. So that's the reason, so to  
20 speak, of this special irradiation in IFA-649, the  
21 disc irradiation.

22 And then after these samples were unloaded  
23 with the SCRAM, they were then subjected to different  
24 hot cell lab as a function of burn-up, ramp rate, and  
25 external restraint and, at the same time, monitored

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 online the krypton-85 release experimentally. This  
2 was very extensively done together with pre and post  
3 tests, a characterization of each sample that was  
4 pursued.

5 Next slide, please. So here very quickly,  
6 the schematics of the two systems that are in the Laka  
7 lab in France, Cadarache, the one to the left is  
8 prostrated pressure, what they call Mirark system  
9 which, again, is monitoring the krypton-85 release  
10 from a sample online.

11 And to the right here is essentially the  
12 same thing, online monitoring of krypton-85. But in  
13 a hot cell system which could go up to about 160  
14 megapascal, and 1,600 degrees C maximum temperature.

15 This, of course, required a lot of safety  
16 validation from hot cell point of view. But both  
17 these systems were available for our IFA-649 testing  
18 that I'm going to talk about subsequently.

19 Next slide, please. Okay. So now, based  
20 on those tests, I'll show you a series of at least  
21 four slides here which give insights into the  
22 mechanism and kinetics of gas release and  
23 fragmentation.

24 The first one is a typical plot of this  
25 online monitoring of temperature which is this red

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 temperature thing that was applied. And at the same  
2 time, the instantaneous release of krypton-85 is  
3 monitored here in the green part.

4 So as can be seen here, the significant  
5 gas release occurs around 200 degrees C in high  
6 burn-up fuel. And the onset of fragmentation is  
7 related to the pressure that each gas bubble has. And  
8 the gas bubble pressure estimation was done  
9 experimentally by this pre-characterization that I  
10 talked about, EPMA, SIMS, and SEMS studies as  
11 irradiated.

12 This particular plot is on as irradiated  
13 sample. And you can see that the estimated pressure in  
14 each of these bubbles, typically shown on the right  
15 micrograph here, ceramograph, as a function of the  
16 bubble radius, the larger the bubble, the lower the  
17 pressure which, again, intuitively sounds right. So  
18 this was experimentally confirmed as well.

19 Next slide. So this was experimentally  
20 confirmed as well.

21 Next slide. Well, another aspect of  
22 mechanistic study was that gas release begins at a  
23 lower temperature where you have partially transformed  
24 structure in the fuel. So if you have partial HBS in  
25 the sample, your release, of course, as you can see in

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the left block here, essentially the same treatment of  
2 temperature times protocol. But the sample to the  
3 left was at 76.1 gigawatt vapor metric ton local  
4 burn-up. And it showed a peak also corresponding to  
5 a lower temperature, as well as around 1200 degrees C.

6           Whereas when you go the high burn-up, a  
7 fully transformed sample, again, the same thing. But  
8 the burn-up local, burn-up of the sample was 103.5  
9 gigawatt vapor metric ton. Again, through peak  
10 characterization we can ensure that it's fully  
11 transformed rim structure or high burn-up structure.  
12 And the release occurred only around 1200 degrees C.  
13 So again, an interesting insight that the modelers  
14 could use.

15           Next slide. So here a very limited  
16 testing on what's the effect of RAMP rate. Again, in  
17 a hot cell bolstered ideation study we can use in our  
18 system two different RAMP rates, .2 degrees per second  
19 and 20 degrees per second. In order, two orders of  
20 magnitude higher RAMP rate.

21           And we could see that as the RAMP rate  
22 increased, the higher efficient gas release and  
23 smaller fragment size were observed. Some of the, we  
24 presented you, several graphs are shown to the right  
25 here.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           Next slide. So, next one is the, gets  
2 even further inside into the mechanism of  
3 fragmentation process. And that is to say that when  
4 you compare untransformed fuel with partial  
5 transformed fuel and the fully HBS sample as a  
6 function of different burn-up that is plotted on the  
7 left slide here. Left plot here.

8           You can see that fuel with no HBS  
9 transformation essentially sees no fragmentation.  
10 Even if you anneal it all the way up to 1600 degrees  
11 centigrade. But fuel with partial and full  
12 transformation starts to release gases and shows  
13 fragmentation right around 1200 degrees C.

14           And the higher the HBS conversation the  
15 particle size distribution after the scram application  
16 of the ram extender temperature ram, was different.  
17 So you can see that the larger, the higher burn-up  
18 showed more finer particles.

19           Again, a lot of these things are quite  
20 intuitive. And again, also seen in integral tests,  
21 but in a very global way. But in doing the separate  
22 effect testes like this, focused on mechanism aspects  
23 of the phenomena, we can confirm and provide some  
24 modeling quality data in each one of these cases.

25           Next. Next slide please. So, just to now

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 wrap it up on what we have been doing is that it's  
2 been a careful experimental work starting all the way  
3 from a very well designed irradiation program in the  
4 Halden Reactor several years ago.

5 Uh, we could get almost homogenous fuel of  
6 lone pedigree. And they will then apply to the  
7 separate testing in a cost effective way to answer  
8 many questions about the mechanism of fuel  
9 fragmentation in LOCA situation. Or for that matter,  
10 any other temperature transient that could be applied  
11 on the fuel material.

12 The initial scoping studies clearly showed  
13 the effect of the PCMI, or what I would say  
14 hydrostatic restrain. And that's an important aspect  
15 that is very, uh, helpful in sort of mitigating  
16 fragmentation if you have strong PCMI.

17 Also, we are continuing to work on things  
18 like fulfilling even more existing knowledge and data  
19 gaps on PCMI and stress corrosion cracking, and what  
20 we call burst release, or also sometimes equally  
21 called transient fission gas release.

22 We're also trying to establish, because  
23 the IFA-649 iteration was very edition. Well, how  
24 does that represent what happens in a fuel rod? So,  
25 equivalence of the IFA-649 behavior and mechanistic

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 studies to fuel, PWR fuel pellet at the high burn-up  
2 is shown on the next slide here. This is still work  
3 ongoing.

4 Next slide please. So here what I'm  
5 showing is a ceramograph of a typical high burn-up  
6 68.8 gigawatt day, seven spam cross-section of a PWR  
7 fuel. And you can actually see the dark zone right in  
8 the center of the pellet there.

9 And if you go to a final magnification,  
10 you actually have four micro-structure zones roughly  
11 across the radius of the pellet. Those are the pink,  
12 yellow, green and purple there on the second figure,  
13 to the right of it.

14 And what we are doing as we speak  
15 actually, literally, is to take two adjacent pellets  
16 and take the radial cores in each case, limited only  
17 to the central part, the mid-radius part, the outer  
18 mid-radius part and the rim part. And then subject  
19 them to the similar temperature transient in MIRARG  
20 and Mexico facility that I described before.

21 And tried to then give specific behavior  
22 based on the micro-structure of the fuel pellet across  
23 the fuel radius. And relayed them to the RAMP rate  
24 and other variables that I talked about. And hoped  
25 there is then these modelers would have data, modeling

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 quality data, from each of these specific zones.

2 And when they smear it over the entire  
3 pellet cross-section they could come up with a more  
4 reliable model of how the pellet itself reacts to a  
5 temperature transient. Which of course would also  
6 support a temperature gradient. And again, if it is  
7 a LOCA then there is a scram situation. And only the  
8 decay heat and gamma heat is present.

9 So, all those could be factored in with  
10 careful modeling. But our objective has been in this  
11 program to shed light on mechanistic model with  
12 careful experiment implementation.

13 And that's, I believe, is my last slide.  
14 I'll be happy to answer any questions.

15 MEMBER PETTI: Yes, this is Dave. I had  
16 a question on the last slide. What's the schedule of  
17 doing this?

18 MR. YAGNIK: We are working on this, the  
19 material is available. Some characterization and  
20 coding has been done. So I would say another six  
21 months or maybe a year. This is in the current phase  
22 of our program that we are working on this.

23 MEMBER PETTI: Thank you.

24 CHAIR BALLINGER: Other questions? Okay,  
25 I've lost track of the order, so --

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 (Laughter.)

2 CHAIR BALLINGER: -- sorry.

3 MR. WELLS: I'll keep us going. I'll keep  
4 us going, Ron. So this is Dan.

5 So I think we're going to shift gears.  
6 We're going to skip a few presentations. We'll skip  
7 the overview. If we have time we can come back to  
8 CRAFT. But we'll skip forward and move to spent fuel  
9 criticality and let Bob and Hatice go. So we'll shift  
10 to back end a little bit.

11 MEMBER REMPE: As we get ready for this  
12 presentation, if people are out there on the internet  
13 and, please, if you're not talking be sure and mute.  
14 Because I think that we've got someone coming across  
15 the internet with some background noise.

16 MS. AKKURT: Okay. So I will be  
17 presenting spent fuel pool criticality issues for ATF  
18 high energy and high burn-up.

19 I am Hatice Akkurt. And Bob Hall will be  
20 presenting the second part, part of this presentation.

21 Now, for this group, you know, either in  
22 front of ACRS, right before the approval of the  
23 Regulatory Guides 1.240, which is based on NEI file  
24 16, criticality guidance and EPRI benchmarks for  
25 depletion uncertainty.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And just as we thought that we were done  
2           and regulatory guidance is issued, but the issue is  
3           that, that guidance, as well as up to five percent  
4           enrichment and 66 for 2301. So when it comes to  
5           LEU-plus, which is the yellow region, you know, of  
6           your for higher enrichment, higher burn-up, you don't  
7           have much data. And also, the existing guidance does  
8           not necessarily apply.

9           So basically to address, find out what are  
10          the issues and to draw (audio interference) have a  
11          roadmap, we performed a spent fuel pool criticality  
12          for advance fuel working group. And this working  
13          group was composed of members from utilities, vendors  
14          and NEI.

15          We had a multi-day working group meeting  
16          that we basically did vote for the guidance, recommend  
17          regulatory guide. And tried to identify, you know,  
18          when we move to a higher enrichment, higher burn-up,  
19          for ATF also, what are the issues that need to be  
20          revisited and what are the technical gaps.

21          And first round was identification of gaps  
22          and issues, potential issues. And then the second  
23          round was (Audio interference) --

24          I'm hearing myself speaking. There is an  
25          echo, right?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 (Off microphone comments.)

2 MS. AKKURT: Okay. So second --

3 (Off microphone comments.)

4 MS. AKKURT: Okay.

5 (Laughter.)

6 (Off microphone comments.)

7 MS. AKKURT: Okay. The second round was,  
8 you know, who is going to lead this thing. It asks,  
9 you know, basically. And some of them were assigned  
10 the utilities because you need advanced analysis for  
11 some cases, right? And some of them were, you know,  
12 vendors needed help with some of their codes and some  
13 of the data gathering needs to be coordinated.

14 But two generic issues, which are going to  
15 be the focus of this presentation, were identified.  
16 And EPRI is leading those two generic issues. The  
17 first one is the criticality code validation. Which  
18 is basically, how do you validate PR codes, you know,  
19 do we have enough critical benchmarks, or do we even  
20 need. This is for fresh fuel.

21 But when it comes for spent fuel, how do  
22 you address depletion, burn-up credit, uncertainty and  
23 bias. And as I mentioned, these two tasks were  
24 identified to be led up by EPRI.

25 So, depletion, uncertainty and bias, what

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 we mean here, you know, this slide and the next slide  
2 is directly from the ACRS meeting we had in March  
3 2021. So, what is the need here?

4 Well, for fresh fuel you go to  
5 contamination of critical handbook and you use the  
6 relevant experiments based on your criticality for  
7 your code validation. When it comes to spent fuel we  
8 don't have experiments to validate our codes.

9 And performing new experiments, you know,  
10 not many facilities exist and you have to perform many  
11 experiments at different facilities. It's not that  
12 feasible unfortunately necessarily.

13 The third option is, you know, using the  
14 fresh fuel assumption. Well, given the fact that if  
15 you have spent fuel using the fresh fuel assumption is  
16 overly penalizing, you know. So how do you account  
17 for this?

18 So, I'll do address this in 1919. The  
19 famous CRAFT memo was issued. Basically, if you don't  
20 have the data you can use five percent, which will  
21 account for your uncertainty, which includes your  
22 isotopic composition, cross-section uncertainties and  
23 so on and also the bias.

24 Obviously this being very easy to use.  
25 You know, easy to be being implemented. You thought

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 you would use this. And then around 2009 NRC asked  
2 for the technical basis.

3 So at that time two parallel paths were  
4 followed. The first path was NRC sponsored work,  
5 which is based on chemical assays. The issue there  
6 is, chemical assays that were performed in '60, '70s  
7 have very large measurement error. And then obviously  
8 Venn Daniels is based on the measurements that has  
9 very larger errors, you know, it showed that CRAFT  
10 memo may not be conservative.

11 But EPRI used a different approached.  
12 Used the flux MAAPs, which are measurements with much  
13 lower uncertainty and used in regulatory space. From  
14 four reactors, 44 cycles, to do the analysis, develop  
15 EPRI benchmarks. And two reports were developed and  
16 then submitted for NRC review. And these were finally  
17 approved in 2020.

18 And the final numbers became, for the  
19 reactor, reactor is a different uncertainty and bias,  
20 as a function of burn-up they are tabulated here. The  
21 first thing is, they showed that five percent is  
22 ideally conservative and there is additional margins.  
23 But again, this is valid up to five percent.

24 Starting this work we asked ourselves two  
25 question. First question is, that we move to LEU+, is

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the CRAFT memo still valid. And the second question  
2 is, MOUs are regulatory approved EPRI benchmarks and  
3 extend this for LEU+ for higher enrichment and higher  
4 probability.

5 So how can we do this? Now, to do this,  
6 you know, we said, okay, it's always good to start  
7 from a physics side under what changed. And you will  
8 go to high enrichment, high burn-up.

9 And also, you know, some of the modeling  
10 tools. There are tools like scales, packages,  
11 TSUNAMI, which does the similarity analysis. Sampler  
12 does uncertainty analysis. You know, basically using  
13 perturbation. Use that and look at what's changed  
14 with how similar are these two systems.

15 And then, you know, extend EPRI benchmarks  
16 to determine, first of all, you know, is it possible  
17 to extent EPRI benchmarks and how we can do this. And  
18 to do this, the stochastic sampling was used.

19 So physics. Well, I mean, all the  
20 actinide production and, you know, in terms of number  
21 uncertainties and reactor contributions were  
22 evaluated. And the table on the left shows, you know,  
23 what changed. The biggest change was for uranium-235.  
24 Which is good news because uranium-235 is the one we  
25 know the best and, you know.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           And in terms of the number density  
2 contribution, the figure on the bottom shows the  
3 number density changes for five percent versus eight  
4 percent. But I will, you know, point your attention  
5 to the fact that five percent, 60, you got up, is  
6 identical to eight percent and 90.

7           I should also mention that, you know,  
8 based on earlier discussions, when you say LEU+, you  
9 know, it is, at the moment, no one is planning to go  
10 up to eight percent and 90. But you know -- or if you  
11 wanted to have, you know, an entire role that will  
12 cover in the future if that is enough for the  
13 development for the full site.

14           Now, the graph on the top is showing the  
15 reaction to contributions. You know, five versus  
16 eight. And again, I will show that. Point you to the  
17 fact that five percent, 60, and eight percent, 90 are  
18 in the curves.

19           Now, the second tool of the TSUNAMI says  
20 there is uncertainty. For those who are not familiar,  
21 this is recently -- a fairly recent tool that has been  
22 added to the SCALE computational package. So  
23 basically there is two systems. And it basically  
24 says, if your similarity portion that is off (Audio  
25 interference.)

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 (Echoing.)

2 MS. AKKURT: -- from zero to one to a  
3 hundred. But based on ISG 10 it says, anything, if  
4 the coefficient is higher than 0.95, they are high,  
5 very highly similar. 0.9 is, you know, high  
6 similarity. And then the caveat it says, you know, at  
7 moments code is limited in use, you know, coefficients  
8 less than 0.9 should not be used. But I do believe  
9 that is based on other sources as well. 0.9 may be  
10 too stringent.

11 But in any event, we did five percent  
12 versus eight percent for different burn-up values.  
13 The diagonal, I know it's a very crowded table and the  
14 subset is shown on the right, but I will point to the  
15 diagonal. And the diagonal everything is about, you  
16 know, 95 out of 100 or 0.95.

17 The figure on the right is showing for  
18 different burn-ups and arrangements, five versus  
19 eight. And surprising here also, that you compare  
20 five percent, 60, and eight percent, 90. Similarity  
21 coefficient is coming as 0.99. Which is basically  
22 telling you that these two systems are almost  
23 identical.

24 Why is that important? Again, it's  
25 consistent with the physics, but also you have

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 yielding to the fact that when you go to a new class  
2 there won't be much implicit uncertainty.

3 Now, coming back to EPRI depletion work.  
4 As I mentioned, those are based on the facts MAA  
5 measurements for the four reactors for four cycles.  
6 You said that, you know, if you didn't -- and those  
7 were binned, and you know, that's the classic example  
8 if you didn't have the data. Assuming we don't have  
9 the data. And what will be the, and why is it  
10 uncertainty bias.

11 The table on the top is based on the  
12 measurements. The table on the bottom is based on the  
13 stochastic sample. Basically, as you can see, you  
14 know, they are very able to reproduce, but it's some  
15 conservative. Given that this is done with the lack  
16 of data. You know, being in good agreement  
17 conservatively is a very good news.

18 So starting, you know, getting some  
19 information from the five percent, extending to eight  
20 percent, then if you see that, even if you go to eight  
21 percent, 90, still the depletion uncertainty of five  
22 percent CRAFT memo is still conservative even if you  
23 move to higher enrichment and higher burn-up.

24 So going back to our original questions in  
25 this work, you know, is the CRAFT memo conservative,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 yes? And can we use EPRI benchmarks in, as they stand  
2 for the NEI class, and the answer is yes. And you  
3 have done this using multiple extended approaches  
4 starting from physics and uncertain analysis and  
5 extend. So it supports this full version.

6 MR. HALL: All right, picking up from  
7 there. We also wanted to look at fresh fuel  
8 validation in the spent fuel pool and new fuel storage  
9 areas.

10 Next slide. So the question was, are  
11 there sufficient critical benchmarks. In the five to  
12 eight weight percent range for LEU+. And the second  
13 one is a little hint of the results and it says, are  
14 they needed. And I'll fill you in on that clue later.

15 So this was a fairly simply and short  
16 story here. We surveyed the available benchmarks from  
17 the handbook and the NUREG and some other places that  
18 you get these from.

19 Using the NUREG/CR-6698 approach. We  
20 performed fresh fuel similarity analysis using  
21 TSUNAMI, which Hatice just talked about. We do this  
22 for a huge number of models. So we're looking at new  
23 fuel vaults, spent fuel pool, different types of  
24 racks, different types of fuel assemblies, with boron,  
25 without boron, with poisons in the pool, without

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 poisons in the pool and so forth.

2 So we're trying to cover the landscape  
3 here in application space. But we're limiting  
4 ourselves to comparing apples-and-apples. So we  
5 compare in a particular configuration, five weight  
6 percent assembly. We compare it to a six, we compare  
7 it to a seven, we compare it to a eight. And we asked  
8 TSUNAMI, are they similar.

9 I think that's good. Next slide please.  
10 So in the first part, the survey of the benchmarks,  
11 the NUREG Table 2.3 has a good bit of guidance that  
12 was established by criticality specialists at the time  
13 and said, hey, these are necessarily conservative  
14 criteria in order for consensus to be obtained for  
15 this guidance.

16 So, in the table are characteristics that  
17 you should try to match to your application, as well  
18 as some boundaries on how far different things could  
19 be. And these experiments are still applicable.

20 And they fall into three general  
21 categories. And that's what materials do you have,  
22 what is the geometry and what is your energy spectrum.

23 So if you look on the table, that's a  
24 snippet of the table. It's not the whole table. But  
25 in blue is what we're interested in for this analysis.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 So fissionable material we're interested in U-235.  
2 For the isotopic composition, we're interest in being  
3 within about two percent of our enrichments. The  
4 five, six, seven and eight.

5 The physical form we have UO2 pellets in  
6 pins. For the moderator we have water. What form it  
7 is, liquid. The density is room temperature liquid  
8 water. The HBU ratio, we're interested in things that  
9 are similar to fuel assemblies.

10 And so, as long as your pin diameter in  
11 your pitch, and pitch is similar, we meet that  
12 criteria. Again (Audio interference) as part of  
13 geometry, as close as possible to the actual case but  
14 not as important as the materials. We have fuel pins  
15 in water, and so those were the experiments selected.  
16 And we need to stick to our neutron energy range,  
17 which is the thermal range.

18 Next slide.

19 MEMBER HALNON: Any poison considered?

20 MR. HALL: In this case there are  
21 experiments that were pulled with poisons and without.  
22 We're not making that distinction. We didn't try to  
23 limit ourselves to one.

24 So this is sort of the broad sweep of  
25 experiments people would pick for a spent fuel pool

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 application where they, one rack may have poisons, the  
2 other rack may not. You pull a set of experiments  
3 that will cover the range.

4 MEMBER HALNON: Okay. It's the same with  
5 the water, no boron?

6 MR. HALL: Boron and no boron. Yes.

7 MEMBER HALNON: Thanks.

8 MR. HALL: So, this a fairly simple  
9 answer. We go to the handbook, we go to NUREG source  
10 and a couple of other places. And the histogram tells  
11 you what we found for pins in water sort of  
12 applications. And what you see is a pretty good  
13 spread all the way up to the upper sevens.

14 And there is, in particular, some stuff in  
15 the mid-sixes that is well represented. So, it didn't  
16 take a lot of work to do this particular part. But  
17 it's a satisfying answer in that there are a  
18 substantial number of that middle of that five to  
19 eight weight percent range of enrichments out there --

20 MEMBER MARCH-LEUBA: This is fresh fuel,  
21 right?

22 MR. HALL: It is.

23 MEMBER MARCH-LEUBA: Even though you want  
24 to apply it to spent fuel?

25 MR. HALL: No.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER MARCH-LEUBA: You want to apply it  
2 to fresh fuel?

3 MR. HALL: That's right.

4 MS. AKKURT: Yes. As I said, there are  
5 two --

6 MEMBER MARCH-LEUBA: You're confusing me  
7 with the title of the presentation.

8 MR. HALL: Right. There two pieces and  
9 they're connected together. When you do the fuel pool  
10 criticality analysis, you do a fresh fuel validation  
11 for your code and then you have to say, well, I  
12 deplete my code now, and I have depleted fuel, now  
13 what I need to do. I need to know how much  
14 uncertainty I have. And that was the first part of  
15 the presentation. How do I put a foundation  
16 underneath that five percent assumption.

17 And NRC also currently requires the HDC  
18 criticals as well, which are from France. And it's  
19 intended to be a mix of isotopes that mimics mid-burn.

20 MS. AKKURT: Yes. It's part of spent fuel  
21 pool criticality. For the criticality portion you  
22 still need to do the fresh fuel to make sure that, for  
23 code validation.

24 MEMBER MARCH-LEUBA: You're evaluating the  
25 code?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MS. AKKURT: Yes.

2 MEMBER MARCH-LEUBA: When you burn the  
3 fuel, whether you have five percent to start with or  
4 eight percent, if you burn five to 60 and eight to 90,  
5 you have the same amount of u-235, you have about the  
6 same amount of plutonium, and a little higher of the  
7 poisons that doesn't count.

8 MR. HALL: Yes.

9 MEMBER MARCH-LEUBA: Anyway, go ahead.

10 MS. AKKURT: Yes. That's why the  
11 depletion uncertainty points, ours was pointing to  
12 that.

13 MEMBER MARCH-LEUBA: Yes. You have the  
14 same isotopics. You --

15 MR. HALL: Right.

16 MEMBER MARCH-LEUBA: -- this --

17 MR. HALL: I called that, I called that  
18 deja vu. You know, we went from five weight percent,  
19 we go up to eight. You burn it farther. And we've  
20 already been there. When we get to eight weight  
21 percent of 90, we've already been there.

22 When we were looking --

23 (Simultaneously speaking.)

24 MEMBER MARCH-LEUBA: -- into the same  
25 condition?

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. HALL: Yes. Same sort of isotopics.  
2 Thank you.

3 All right. For the second part of this  
4 second half, the pictures on the right are images of  
5 our two-by-two rack configurations. And as you can  
6 see, we didn't necessarily fill the racks, we just had  
7 some two out of four, three out of four, three out of  
8 four fuel assemblies in those four rack cells.

9 The list on the left tells you all of the  
10 different conditions that we looked at. And again,  
11 we're going to do a very simply apples-and-apples  
12 comparison of five weight percent through higher  
13 enrichments and see what the code tells us.

14 Next slide please. And this is a really  
15 boring slide. It says, everything is 0.98 or higher.  
16 And, you know, there is some disagreement over where  
17 the cutoff should be for similarity, but no one would  
18 argue with .98. .98 says, these are almost identical.

19 And so, for the fresh fuel situation in  
20 new fuel storage in spent fuel pools, so in that very  
21 thermal environment, we have the same materials, we  
22 have the same geometry. We have about the same  
23 spectrum. There really isn't anything --

24 So even the NUREG criteria would tell you  
25 the same. Say, look, we have almost the same, we have

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the same geometry, we have the same materials. We  
2 also still have the thermal spectrum, it ought to look  
3 similar. The code says it's .98 or above.

4 So that means, practically speaking is,  
5 that if you can successfully validate your code for  
6 five weight percent fuel, you don't need to do  
7 anything else for five to eight weight percent to go  
8 above five weight percent. Or the fresh fuel  
9 condition. The code is telling you that you've  
10 already covered that.

11 So, in answer to the original questions,  
12 significant, there are a significant number of  
13 benchmark experiments in the five to eight percent  
14 range. And people will include those when they do the  
15 criticality analysis.

16 However, enrichment is an extraordinarily  
17 weak variable for this application. It seems like it  
18 should be a strong variable, but it is not. And we  
19 get that same result across numerous fuel types, rack  
20 types --

21 MEMBER MARCH-LEUBA: Yes, since we're not  
22 assigning anything, we'll take your -- I'll take your  
23 word for it, but obviously key is, what does TSUNAMI  
24 do because I can bring your code up, .98 without  
25 distribution around it.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. HALL: Sure. Well, TSUNAMI is written  
2 by Oak Ridge to try to --

3 MEMBER MARCH-LEUBA: I work in that -- I  
4 used to work in that floor, two offices down.

5 MR. HALL: Okay.

6 MEMBER MARCH-LEUBA: So I know them  
7 people. But I don't know this.

8 MR. HALL: So out take on TSUNAMI is, you  
9 know, it's looking at every material, every  
10 cross-section. It's looking at every co-variants,  
11 point in the co-variants matrix. It's very stringent.

12 And so, what we've convinced of, is that  
13 if TSUNAMI tells you it's a 1.0, as close to 1.0 or  
14 very similar, it really is very similar. What we're  
15 not as sure of is when the TSUNAMI tells you, you have  
16 a .7, we're not as sure exactly what that means. It  
17 doesn't mean that there is no value for the critical  
18 experiment, but it means it's not identical. So  
19 that's sort of the gray zone.

20 MS. AKKURT: Yes.

21 MR. HALL: But in this particular case,  
22 what we're presenting today, there isn't really a, in  
23 my mind, a question that .98 and above really does say  
24 the same.

25 MEMBER HALNON: There was some insight you

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 can gain by the spread. Was clearly expanding the  
2 higher enrichments of something --

3 MR. HALL: Yes.

4 MEMBER HALNON: -- so you can extrapolate  
5 that out to some extent. I don't know if you want to  
6 go linear or something else.

7 MR. HALL: TSUNAMI did say that there is  
8 a difference. It said that difference is quite small.

9 MS. AKKURT: And I should say that, you  
10 know, we didn't, in the interest of time, we didn't  
11 include the special on-coded as you had all expect,  
12 you know, from an attorneys point of view. You're  
13 aware that chrome, chromium coating, or other coating  
14 materials, impact is negligible so that's why it is  
15 not spelled out, should be part of the record.

16 MR. HALL: Yes. Chrome coating and doping  
17 had almost no effect on --

18 MS. AKKURT: But TSUNAMI can show these  
19 similarities. And, you know, the group that is  
20 working on an accrument and so on. And God rest your  
21 earlier comment.

22 MEMBER MARCH-LEUBA: Changing subjects.  
23 You promised me earlier that you were going to talk  
24 about --

25 MS. AKKURT: Yes, we will.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER MARCH-LEUBA: -- long-term decay.

2 Oh yes? High burn-up fuel.

3 CHAIR BALLINGER: I noticed there's a hand  
4 up in the --

5 MEMBER MARCH-LEUBA: Oh, it's the next  
6 presentation.

7 MEMBER KIRCHNER: I did.

8 MEMBER MARCH-LEUBA: Okay.

9 MEMBER KIRCHNER: You're right on key.

10 (Off microphone comments.)

11 MS. AKKURT: The next one in the agenda is  
12 eight.

13 MR. WELLS: Yes, we're going to -- so is  
14 there any more questions on this one, or should we do  
15 that and then --

16 MEMBER KIRCHNER: This is Walt Kirchner.  
17 Just an observation. What you're really saying is,  
18 when you say the enrichment impact, at least in terms  
19 of doing your benchmarks isn't that significant, is  
20 that for this kind of lattices in LWR in water, in  
21 light water, that's more dominant in the range of  
22 enrichments that you're looking at then, in other  
23 words, the geometric configuration of materials is  
24 probably more dominant than the enrichment. As long  
25 as you're staying within a reasonable 15x15 to 17x17

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 PWR or the same for BWR bundles.

2 MR. HALL: Yes, I think that's a fair  
3 characterization.

4 MEMBER MARCH-LEUBA: I mean, honestly  
5 we're not reviewing the results from your analysis,  
6 we're taking your word for it. I would like to see  
7 how much gadolinium is in there, how much burnable  
8 portions are in there, how much does it affect the  
9 spectrum and everything else.

10 For you to be able to be below an eight  
11 percent fuel enrichment in the same core that used to  
12 run a five, you need to put a lot more gadolinium in  
13 it.

14 MR. HALL: Sure. I know the, when we said  
15 we covered a big-broad spread of types of fuel, we  
16 have three and eight weight percent gad. I don't  
17 recall how many pins are in those.

18 MEMBER MARCH-LEUBA: No, I'm saying is, if  
19 you have a five percent uranium, you have 25  
20 enrichment --

21 MR. HALL: Yes.

22 MEMBER MARCH-LEUBA: -- bundle. And now  
23 you're putting in the same slot an eight percent  
24 enriched bundle, it goes super critical. You have to  
25 cut it down somehow.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. HALL: Yes.

2 MEMBER MARCH-LEUBA: And you cannot change  
3 the boron in the water because there are limits. So  
4 you have to do it with burnable poison. And burnable  
5 poisons are difficult. Notoriously difficult to  
6 model.

7 And I didn't see any mention in your  
8 similarity analysis for gadolinium. We're not  
9 reviewing that, we're just getting here information.  
10 But if we were, I would be asking you questions about,  
11 like burnable portions are very difficult to model.  
12 They're very dark in particular energies, so, anyway.

13 MR. HALL: Okay, that's a good point. All  
14 right, so changing gears a little bit. This is --

15 MR. WELLS: So, Bob, sorry, so just so  
16 everyone keeps up. So this is 13.

17 MR. HALL: Yes. I just, I was --

18 MR. WELLS: So in the PDF it's Page 193.  
19 But that's where we're moving to next. Yes, I thought  
20 that might be helpful so I looked it up.

21 MR. HALL: All right. So I'd like to  
22 present results of a scoping analysis that we did for  
23 a transition from current burnup and cycle designs to  
24 ATF/LU+ and higher burnup cycle designs. And, again,  
25 I would say it says right on the title slide,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 preliminary scoping results.

2 The report that this is in is actually  
3 going to publications today so the review process has  
4 been completed for that. And the numbers I am going  
5 to show you today are similar to what is in that  
6 report, very close. I will point out where there is  
7 a slight difference.

8 Okay. So the purpose and goals here are  
9 to look at the back end of this transition to higher  
10 burn up fuel and ask the question what is the impact  
11 on managing your spent fuel pool inventory in the  
12 spent fuel pool and in your migration out to dry  
13 storage? And, again, this is a high level first  
14 effort here. And we had a couple of goals.

15 First, we wanted to get some realistic  
16 estimates of what a move to higher burnups looks like  
17 by way of traditional typical core designs for a PWR  
18 and then we want to identify key variables. What are  
19 the really important variables in whether or not this  
20 will affect your storage?

21 We want to estimate the trends. We want  
22 to say something to the extent we can about the ISFSI  
23 dose rates. And, again, we are using high level  
24 scoping, simplifying assumptions. This is not plant  
25 specific or dry storage system specific. But it is

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 intended to identify the key variables and the trends.

2 All right. As you know, there are  
3 tradeoffs with this increase in enrichment and burnup.  
4 As we push enrichment and burnup up, the number of  
5 assemblies that we use and the number of canisters  
6 that we need to load comes down.

7 As we push burnup up, the decay heat and  
8 the dose rate will go up. The cooling time and  
9 increased enrichment will push that back down to some  
10 degree. And then when we talk about the overall  
11 inventory, when we increase cooling time requirements  
12 on individual assemblies, that increases the number  
13 that you have to hold up in the spent fuel pool.  
14 However, you are discharging fewer assemblies to the  
15 spent fuel pool. And so there are a lot of trade off  
16 effects here that we need to gather up into one net  
17 effect and that is the goal here.

18 Next slide. So a couple of slides just to  
19 remind us what the decay heat looks like as a function  
20 of cooling time for different burnups. No surprises  
21 there. But when you take the plot on the left and you  
22 transpose it onto the right to constant decay heat,  
23 those are constant decay heat curves on the right.

24 And what that says is, if we have  
25 discharge burnups in the 45 gigawatt day per ton area

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 -- I think the industry average is around 47 right now  
2 -- it doesn't matter that much what your decay heat  
3 limit is in your canister. You don't need to wait  
4 that much longer, you know, across that decay heat  
5 span.

6 But when you push out to say 60 gigawatt  
7 days per ton, that gap opens up quite more, a good bit  
8 more. And so the effect on the holdup time is  
9 starting to get large as we push out to the burnups  
10 that we are talking about. So how much of an effect  
11 is that? Is that something we are going to need to be  
12 concerned with?

13 So first, the point we make on this slide  
14 is we need realistic burnups and enrichments.  
15 Enrichment does play an offsetting role for dose  
16 rates, and it also plays an offsetting role for decay  
17 heat. Enrichment and burnup, increased enrichments  
18 reduce actinide production in particular.

19 MEMBER MARCH-LEUBA: Because you are  
20 burning --

21 MR. HALL: You are burning more U-235 and  
22 less of other materials. And so --

23 MEMBER MARCH-LEUBA: Hard to believe.

24 MR. HALL: It manifests. Yeah, it  
25 manifests both in decay heat and in the dose terms.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 The degree to which depends on how much burnup did you  
2 add and how much enrichment did you --

3 MEMBER MARCH-LEUBA: It's a function of  
4 burnup, not of enrichment.

5 MR. HALL: Yeah, both, right.

6 MEMBER MARCH-LEUBA: No, sir. No. The  
7 production of U-239, the production of U-239 is  
8 depending on how much U-238 is in there.

9 MR. HALL: And also the spectrum. In  
10 other words when you burn the fuel assembly with more  
11 U-235, you have lower flux in a constant power  
12 reactor. And so when you do that you get less rapid  
13 build-up of U-239 even though you have the same amount  
14 of U-238.

15 MEMBER MARCH-LEUBA: Yeah. Okay.

16 MR. HALL: So the actinides will build in  
17 slower at the higher enrichments.

18 MEMBER MARCH-LEUBA: A little bit.

19 MR. HALL: So it is one of those tradeoff  
20 effects.

21 MEMBER MARCH-LEUBA: You have to look at  
22 the calculation.

23 MR. HALL: Yes, yes.

24 MEMBER MARCH-LEUBA: I see here that 75  
25 gigawatt, the hermetic term versus 15 you have a

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 factor of 5 in decay heat. Some of those are linear.  
2 I mean, if you look at the left figure --

3 MR. HALL: Oh, yes.

4 MEMBER MARCH-LEUBA: -- of 40 cooling  
5 time.

6 MR. HALL: Mm-hmm.

7 MEMBER MARCH-LEUBA: -- the heat is almost  
8 linear.

9 MR. HALL: Right.

10 MEMBER MARCH-LEUBA: It is a function of  
11 -- I mean, there might be a secondary effect on  
12 enrichment, but that figure on the left tells me it  
13 wasn't a burnout.

14 MR. HALL: It is more than linear. I  
15 would love to have a ratio curve for you.

16 MEMBER MARCH-LEUBA: Obviously, you burn  
17 it wrong, and you are burning more plutonium. So you  
18 have to do the numbers. Basically, at the end of the  
19 day you have to do the numbers. You cannot guess.

20 MR. HALL: Yeah, yes. I think that is the  
21 point of this analysis. It isn't clear to what degree  
22 you will offset. And our point on the next slide is  
23 that we need to use realistic burnups and enrichments  
24 because of this post-tradeoff. We need to get the  
25 tradeoff right. Utilities do not pay for more

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 enrichment and not burn the fuel farther.

2 They will get -- at least the burnup and  
3 the enrichment go together and that is what you see on  
4 the right plot. That is the U.S. EIA annual discharge  
5 burnup data. And you can see as we have gone through  
6 time, we have also gone through enrichment increases.  
7 We started out these cycles in the three-way percent  
8 area --

9 MEMBER MARCH-LEUBA: Mm-hmm.

10 MR. HALL: -- and now we are up to, you  
11 know, the mid-fours, and we've gone up in burnup as  
12 well. The main point of this slide is what is the  
13 batch discharge burnups we should be thinking about  
14 for the various limits of the peak rod burnup limit?

15 So what you see in the current situation  
16 is peak rod limit is about 62 gigawatt days per ton.  
17 That's shorthanded. It varies a little bit from that.  
18 But at 62 we see maximum discharge burnups of about  
19 47. And so why the big difference?

20 And on the left, I won't go through all of  
21 those, but there are a lot of practicalities in core  
22 design. I spent 37 years in the core design group.  
23 The practicalities of core design is you can't push  
24 every assembly up to the limit. You know, there are  
25 a list of things on the left there that you have to

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 account for. And so the maximum practical batch  
2 average burnup is about 80 percent of that peak rod  
3 burnup limit, give or take about 5 percent.

4 And so we look to that because what we are  
5 proposing here is we are going to look at what happens  
6 when we go from 62 gigawatt days per ton to 75. So we  
7 have to know what is our batch burnup going to be  
8 looking like to that not what the burnup limit is  
9 because that --

10 MEMBER MARCH-LEUBA: I can tell you. I  
11 don't even need to calculate it. If you go from 18  
12 months to 24 --

13 MR. HALL: Mm-hmm.

14 MEMBER MARCH-LEUBA: -- it will go up 25  
15 percent.

16 MR. HALL: But it doesn't because you have  
17 to use more fuel. Unless you keep the same batch size  
18 --

19 MEMBER MARCH-LEUBA: The low to this,  
20 yeah, this SFP is higher, 25 percent higher.

21 MR. SMITH: If you go to 24 month cycles,  
22 the loss of efficiency will actually reduce the  
23 burnup.

24 MEMBER MARCH-LEUBA: You will have to  
25 speak up.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER REMPE: Yeah, say your name and  
2 lean in.

3 MR. SMITH: Yeah, Fred Smith. When you go  
4 from 18 to 24 month cycles, the batch size increase is  
5 so large that the utilization drops and so the average  
6 burnup also drops. You can't go from 18 to 24 months  
7 without --

8 MEMBER MARCH-LEUBA: You're wasting --

9 MR. HALL: -- putting a lot of fuel into  
10 the core. And you are wasting. It is not as  
11 efficient.

12 MEMBER MARCH-LEUBA: You are wasting fuel.  
13 You are wasting good uranium.

14 MR. SMITH: That's right.

15 MEMBER MARCH-LEUBA: Anyway. You just  
16 have to do the calculation.

17 MR. HALL: And this is the calculation  
18 done in approximate form. So for current PWR cycles,  
19 where we are right now is about 44 gigawatt days per  
20 ton at 4 weight percent. I'm not saying we are at 4  
21 weight percent but that is a nice benchmark point from  
22 the discharge data. And the discharge burnups  
23 increase about 11 gigawatt days per ton per weight  
24 percent. So that is a rougher rule of thumb.

25 So for our scoping, we are using an Oak

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 Ridge tool from the reference that you see there to do  
2 estimates of what the discharge burnups are for each  
3 batch and sub-batch. Given the limits that we just  
4 talked about, 80 percent of the 62 gigawatt days per  
5 ton, we are 80 percent of the 75 gigawatt days per  
6 ton.

7 And that figure on the right is from that  
8 Oak Ridge report by the way that -- it just points out  
9 that 24 month cycles and 18 month cycles, the  
10 relationship between enrichment and burnup, there is  
11 a third variable in there as well and that is the  
12 specific power of the core. So they are all important  
13 in determining what should be -- what is the  
14 enrichment and burnup combination going to be to  
15 achieve the cycle that you want, whether 18 months or  
16 24 months.

17 All right. So given that, we have -- next  
18 slide, please. That was the next slide, I'm sorry.  
19 I was looking at my own slide. Sorry. I didn't tell  
20 you. So we wind up with three cases we want to look  
21 at. We've got a core size of 157 assemblies, 17 x 17  
22 PWR, 98 percent load factor.

23 And these reload batches are average in  
24 equilibrium. So, you know, when you see two  
25 assemblies in a sub-batch, it doesn't literally mean

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 two assemblies in a sub-batch. That is an average.  
2 But what you see are three cases that we look at, a  
3 base case that is 18 month cycles, similar to what  
4 most PWRs are running today and then you have an  
5 18-month higher burnup case and a 24-month higher  
6 burnup case.

7 So we run the tool, trying to stay within  
8 our discharge burnup limits. And we push the  
9 enrichments up and shrink the batch sizes to the  
10 extent that we can, and this is where we wind up. We  
11 start out at 4.4 weight percent with the batch sizes  
12 you see there, two sub-batches, 41 and 25 assemblies.

13 For the 18-month cycle, we are running 5.1  
14 weight percent, batch average, with 53 assemblies out  
15 of the 157. It is just above 33 percent batch load.  
16 And then for the 24-month cycles, we move up to 5.4  
17 weight percent with 74 assemblies loaded. And you can  
18 see what the sub-batch discharge burnups are there and  
19 what the average discharge burnup is for those  
20 situations, those three cycles we want to look at.

21 So we also need to know what is the  
22 canister decay heat limit so how long I have to keep  
23 it in the fuel pool depends on that. So these are the  
24 three cases that we have looked at for the canister  
25 decay heat limits.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           The first one is a uniform loading. The  
2 second two are zone loadings, similar to some  
3 licensing from the last 10 years of modern 37 assembly  
4 canisters. By the way, the total heat load in these  
5 cases is between 42-1/2 and 50 kilowatts per 37  
6 assembly canister.

7           Next slide, please. Okay. So we did  
8 first a simple first simulation of equilibrium spent  
9 fuel pool inventory assuming a uniform canister load  
10 decay heat limits. And the assumption here is that we  
11 load everything that we can into a canister that  
12 qualifies for loading into a canister. If it doesn't  
13 qualify, we hold it up in the spent fuel pool. And we  
14 run that for several cycles until we get to an  
15 equilibrium of how many fuel assemblies are what we  
16 call stranded assemblies in the fuel pool waiting --  
17 that have to wait longer before they can be loaded  
18 into a canister.

19           And what you see from the curve on the  
20 left is that the impact on how much fuel you need to  
21 hold up in the fuel pool above and beyond what the  
22 base case is telling us. So on the left axis, on the  
23 Y axis, that is how many full core equivalents  
24 additional space do you need in the fuel pool to  
25 accommodate this transition to higher burnups? And

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 the answer is it depends on your decay heat limit in  
2 your canisters.

3 If you push off to the right and you had  
4 a very high decay heat limit in the canisters, there  
5 is essentially no effect. If you stay to the left and  
6 you have low decay heat limits on your canisters, then  
7 the answer is a lot.

8 And so we have identified our first key  
9 variable, and that is what is the decay heat limit in  
10 the canisters?

11 MEMBER HALNON: Bob, does this take into  
12 effect the loading patterns that are presently having  
13 to be done because of the B.5.b and other aircraft  
14 impact issues?

15 MR. HALL: No. This is a hypothetical  
16 high level spent fuel pool. If you had B.5.b, of  
17 course, that limits how many assemblies you could --

18 MEMBER HALNON: Right. So --

19 MR. HALL: Yeah.

20 MEMBER HALNON: -- okay. So this is  
21 obviously a retro.

22 MR. HALL: Right.

23 MEMBER HALNON: Okay.

24 MR. HALL: So this is really a delta  
25 exercise. So this could be for a B.5.b pool first and

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 then second.

2 MEMBER HALNON: What is the worst number  
3 of assemblies in your nominal core that you are  
4 looking at?

5 MR. HALL: In the example that I had on  
6 the previous slide was 157 assemblies.

7 MEMBER HALNON: I'll take a look. I  
8 missed that. Thanks.

9 MR. HALL: We actually did it for 100  
10 assembly, a hypothetical core 157 and 193.

11 MEMBER HALNON: Yeah. That pretty much  
12 bounds what we are --

13 MR. HALL: Yeah. We wanted to exercise  
14 some of those assumptions as well. So on the next  
15 slide you will see the slightly finer pencil answer.

16 Next slide, please. This is all about how  
17 much additional space you need in your fuel pool. And  
18 the answer is it depends on your canister load.  
19 Again, we already saw that in the previous example.  
20 But for a 24-month cycle transition, somewhere between  
21 .2 and .8 full cores of additional fuel space in your  
22 pool. Now this is assuming that the canister decay  
23 heat limits have not changed.

24 MEMBER MARCH-LEUBA: And then regarding  
25 the canister revolution, is the big rod limiting the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 canister or is this the evidence rule?

2 MR. HALL: I have not loaded canisters  
3 either so full disclosure. The limits we are dealing  
4 with is the -- we are looking at just the decay heat  
5 --

6 MEMBER MARCH-LEUBA: Yeah. What is the  
7 (simultaneous speaking).

8 MR. HALL: -- and the zoning of the decay  
9 heat.

10 MEMBER MARCH-LEUBA: I have bundles with  
11 -- whole bundles and (simultaneous speaking) --

12 MR. HALL: There is definitely --

13 MEMBER MARCH-LEUBA: -- it has to be  
14 limited error if you are going to put a very high  
15 bundle with a weak cover.

16 MS. AKKURT: There are two limits. One  
17 is, you know, on the limits --

18 MEMBER MARCH-LEUBA: Mm-hmm.

19 MS. AKKURT: -- there is a limit for that.  
20 And the one, the system design, it varies and then one  
21 is for the total.

22 MEMBER MARCH-LEUBA: Yeah. Again, you  
23 have to render the simulation for your particular plan  
24 --

25 MR. HALL: Yes.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1                   MEMBER MARCH-LEUBA:  -- your particular  
2 matter, subject to loading your particular canisters.  
3 And is an extra ordinate core reload for spent fuel a  
4 problem?  I mean, it used to be a problem when we  
5 didn't have dry storage.

6                   MR. HALL:  Right.

7                   MEMBER MARCH-LEUBA:  But today is it a  
8 problem?

9                   MR. HALL:  That is the question.  And the  
10 answer is it depends on your particular situation.

11                   MEMBER MARCH-LEUBA:  It depends on what  
12 you are doing with your canisters, right?

13                   MR. HALL:  Right, right.  So our part --  
14 I mean, you are coming to the same place we are.  We  
15 are identifying the key variables and what the trends  
16 are.

17                   MEMBER MARCH-LEUBA:  Mm-hmm.

18                   MR. HALL:  And we are saying, okay, you,  
19 utility, you need to analyze this.

20                   MEMBER MARCH-LEUBA:  Well, this is what I  
21 was telling you.  You went to 24 cycles with high  
22 enrichment or higher burnup.  You are going to cool  
23 them longer.

24                   MR. HALL:  Yes.

25                   MEMBER MARCH-LEUBA:  The percent is -- as

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 we said, 30 years ago do you have room in your pools?  
2 But now we will be moving into dry storage.

3 MR. HALL: All right.

4 MEMBER MARCH-LEUBA: You are going to have  
5 to move it to dry storage faster.

6 MR. HALL: The dry storage campaigns are,  
7 you know, highly intrusive to the site operations. So  
8 you have to plan it plus you usually do the -- so you  
9 can plan out a full core offload at some point --

10 MEMBER MARCH-LEUBA: Yeah.

11 MR. HALL: -- in the spent fuel pool. Now  
12 you might have to plan it out for a two core offload  
13 in the future. So that is what --

14 MEMBER MARCH-LEUBA: What I'm saying is --

15 MR. HALL: -- especially with an 80 year.

16 MEMBER MARCH-LEUBA: It may be a problem.

17 MR. HALL: It certainly is a logistics  
18 issue down the road. It may not be a problem today  
19 because if they just did a campaign, you are going to  
20 have much more than what you need, but it is a capital  
21 expenditure. It's logistics.

22 MEMBER MARCH-LEUBA: The engineering to me  
23 is if I'm there, the plant manager for Plant X, I will  
24 ask you to calculate my next --

25 MR. HALL: Mm-hmm.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER MARCH-LEUBA: -- 10 reloads and see  
2 if I have room, see what I need to do.

3 MS. AKKURT: And they have tools for that.

4 MEMBER MARCH-LEUBA: Yeah. Yeah, I see.  
5 But --

6 MS. AKKURT: No, no. I mean, you know,  
7 usually the coal operating plants, you know, they do  
8 the cask loading campaigns every two or three years so  
9 they can do multiple at the same time.

10 MEMBER MARCH-LEUBA: Mm-hmm.

11 MS. AKKURT: Because that reduces your  
12 training requirements and also gaining experience in  
13 terms of logistics and so on. But, you know, if you  
14 have cask loader software, for example, a part of it  
15 is, you know, for your existing campaign to plan but  
16 you can do scoping for the next 10 years, 20 years and  
17 so on.

18 MEMBER MARCH-LEUBA: Probably for this  
19 scoping calculation, you don't need to find it. All  
20 you need when you buy the new core, when you buy the  
21 new core, you can save one bundle, you save a bundle  
22 of money. And so you can recalculate your core  
23 distribution. But for this calculation, one extra  
24 bundle doesn't make a difference. So, yeah, go ahead.

25 MR. SANTOS: Can I add one thing? This is

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 Al Santos, NEI. This study was done evaluating the  
2 status quo with the current existing canister designs  
3 and limits.

4 There are efforts underway to try to  
5 expand those limits due to the hybrid of demonstration  
6 casks that was loaded. When we loaded it, we thought  
7 it was at a much higher temperature. And we actually  
8 did a thermal couple. It was at a much lower  
9 temperature than we anticipated because of the -- I  
10 think the many conservative assumptions that we put  
11 into the thermal analysis of the materials so in the  
12 fuel.

13 So in this case if we are looking at the  
14 future, one of the areas that we can change, you know,  
15 this calculus, is like changing or, you know, the  
16 limits that are on the canisters now. There is  
17 already a PIRT underway looking at trying to change  
18 that and go up from a 400 degree C limit total  
19 canister individual fuel in its cells and increasing  
20 the entire heat bundle, you know, the entire canister  
21 bundle limits as well as the cell limits. That's what  
22 Hatice was talking about.

23 If you have individual cell limits and  
24 locations where they are in terms of how much heat you  
25 put in there, but also you have the total canister

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 limits. And so there are aspects of this that this  
2 could change in terms of like how much more you need  
3 there if you can offload the fuel faster from a pool  
4 to the canisters as well as having a hotter, you know,  
5 more assemblies in there.

6 MEMBER MARCH-LEUBA: It all depends on  
7 what you have plan to do, right?

8 MR. SANTOS: Correct.

9 MEMBER MARCH-LEUBA: I don't know. If I  
10 see a point -- including .2, it could be as high as  
11 .8. If that is a problem, you are running a tight  
12 ship. You should have that much margin.

13 MR. HALL: Right. When we started the  
14 preliminary analysis, we didn't know what the number  
15 would be so, you know, .2 is, I think, everyone would  
16 agree that's pretty small. That's a pretty small --

17 MEMBER MARCH-LEUBA: If you can't  
18 accommodate that --

19 MR. HALL: Right. That is a very small  
20 number.

21 MEMBER MARCH-LEUBA: (Simultaneous  
22 speaking) running.

23 MR. HALL: So, you know, we were kind of  
24 happy to see that number.

25 MEMBER MARCH-LEUBA: Mm-hmm.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. HALL: It is quite small. All right.  
2 So I think we've covered this slide. The results for  
3 the finer pencil approaches are broadly similar to the  
4 simple illustration.

5 Next slide, please. The other thing of  
6 interest, we have different fuel in the fuel pool now.  
7 And we have a little bit more fuel in the fuel pool so  
8 what about the peak decay heat. The peak decay heat  
9 in the fuel pool happens right after you finish  
10 offloading the core. And so we looked at what does  
11 the peak decay heat look like for each of these  
12 scenarios? And you can see in the table there what we  
13 found. We are assuming that the last assembly from  
14 the offload goes in about 140 hours after core  
15 shutdown. And the numbers in the final report change  
16 slightly. They are about 2 to 4 percent essentially.  
17 That is the bottom line.

18 So, again, it is not zero, but it is a  
19 small number. And so when you look at the first box  
20 that we saw about how much longer the decay time would  
21 be at these higher burnups, you wondered, is that  
22 going to be a big problem? And the answer here again  
23 is coming up, it's not zero, but it's small.

24 MEMBER MARCH-LEUBA: It's look like it is  
25 counterintuitive. So I hope somebody went in to check

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 you out because this does not seem to be consistent  
2 with the left figure on -- the figure on Slide 4.

3 MR. HALL: Next slide, please. We also  
4 wanted to say a little bit about dose rates. And we  
5 leaned here on an Oak Ridge study that was done in  
6 2020 where they did a uniform canister loading of fuel  
7 with different burnup with all fuel assemblies having  
8 the same decay heat. So they used 1,200 watts. So in  
9 other words you have enrichment and burnup  
10 combinations that you decay for enough time to get it  
11 to 1,200 watts and then you put it in the canister.

12 And so what happens as you go up in  
13 enrichment and you go up in burnup and you go up in  
14 decay time, but you still come back to the same decay  
15 heat limit in the canister and the answer is in that  
16 plot.

17 And what that says is this is normal  
18 storage of a dry storage canister inside a concrete  
19 overpack. So this is the external dose rate that a  
20 worker would see walking around the ISFSI. And it is  
21 monotonically decreasing as you increase the burnup.  
22 That seems counterintuitive but it is because of the  
23 extra decay time that is required for those higher  
24 burnups prior to being able to put this in dry  
25 storage.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           That extra decay time offsets -- it decays  
2 off the dose contributors such that the net effect is  
3 that for normal storage, which is again gamma  
4 dominated, those dose rates come down. Now those dose  
5 rates are coming down per canister. And in addition  
6 to that, we have fewer canisters that are being  
7 loaded. Fred talked about approximately 20 percent  
8 less. For this study, we are looking at 15 to 20  
9 percent less. And so in addition to the fact that the  
10 dose rates per canister are coming down you also have  
11 fewer on the pad.

12           And just to confirm this -- next slide,  
13 please -- we took the 18 to 24-month transition that  
14 we modeled for this study and ran it through the EPRI  
15 cask loader software. And we asked the cask loader  
16 software, the person who ran that, to take our  
17 discharge burnups from the 18-month base case and for  
18 the 24-month higher burnup, load that uniformly into  
19 the cask loader software and tell me what you get.

20           And what happened is what you see on the  
21 slide. We have a combined figure of merit. It  
22 doesn't give dose rates, but figures of merit are  
23 proportional to the dose rates. For the canister  
24 system, we are reduced by 8 percent for the 18 to 24-  
25 month transition.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1           A larger reduction in gamma, a little bit  
2 of an increase in neutrons, but these are highly gamma  
3 dominated systems. And in addition to the 8 percent  
4 reduction per canister, we have 16 percent fewer  
5 canisters for this particular example.

6           And so our broad conclusion from this, for  
7 our preliminary work, is that there is a smaller  
8 beneficial dry storage dose rate change particularly  
9 for the normal storage configurations.

10          And finally, I think my last slide is just  
11 the conclusions which we have already talked about  
12 these. So I think the best thing to do is just to see  
13 if there is any more discussion or questions on what  
14 was done and what the results look like.

15          CHAIR BALLINGER: We visited a vendor a  
16 little while back, and we had a long discussion about  
17 increased burnup and increased --

18          MEMBER MARCH-LEUBA: Get closer to the  
19 microphone there.

20          CHAIR BALLINGER: Increased burnup and  
21 increased enrichment. And he said that from an  
22 economic point of view, they would have to recommend  
23 a single batch core.

24          MR. HALL: And by single batch core --

25          CHAIR BALLINGER: That's what it means.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 You fill it up.

2 MR. HALL: You mean load the entire core  
3 -- from a 157 assembly core --

4 MEMBER MARCH-LEUBA: If you can let me a  
5 50 percent swap. I mean, why don't we do 30 percent  
6 swap in loading. If you cannot make a 50 percent  
7 swap, you have to go to a 100. So it is either 33, 50  
8 or 100. It is discrete. You cannot swap 60 percent.

9 MR. HALL: So I would say that there was  
10 a slide that I had with the two curves --

11 MEMBER MARCH-LEUBA: Mm-hmm.

12 MR. HALL: -- that were a function of  
13 24-month or 18-month cycles enrichment and what the  
14 specific power of the plant was, right? This is why  
15 the BWRs have already moved to 24-month cycles.

16 MEMBER MARCH-LEUBA: Mm-hmm.

17 MR. HALL: It is because they are lower on  
18 the specific power curve. They don't need the  
19 enrichments. And so they are staying well below 50  
20 percent and doing 24-month cycles because of where  
21 they are on that curve. It is for the high duty PWRs  
22 that becomes more difficult.

23 But what we are showing here, I think if  
24 you looked at our 24-month, we were looking at  
25 something like -- our batch loads were in the 40s,

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 mid-40s to upper 40s. So we are below 50 percent with  
2 5.4 weight percent, and we do not exceed the burnup  
3 limits.

4 And so core designers do Whac-A-Mole,  
5 right, if you remember that game? You got to meet --  
6 you hit one limit, the other one pops up and so this  
7 hits all of the limits. It stays within the  
8 enrichment limits, within the burnup limits and under  
9 50 percent. And it was -- you know, we assumed in  
10 this case 98 percent load factors and very short  
11 outages of 20 days so it appears to us at least from  
12 the scoping study that it is quite doable.

13 MR. SMITH: It is Fred from EPRI. From an  
14 economic point of view, they would have -- to make it  
15 work financially for a customer, they would have to go  
16 to a single batch core.

17 MR. HALL: Fred, you might want to speak  
18 to this. You've done this study, right?

19 MR. SMITH: So the fuel management that  
20 we've done in several three dimensional, not just  
21 scoping, but full fuel management, demonstrates that  
22 we can get below a 50 percent batch fraction.

23 And if you go much beyond that, the  
24 economics of 24-month cycles become very negative.  
25 And that's why you don't see -- only 24 percent of the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 fleet has gone to 24-month cycles because they can't  
2 get there with a reasonable batch size.

3 And so, yes, if you don't keep the batch  
4 fraction down, then the fuel costs overshadow the  
5 outage savings, and people don't go there. So their  
6 statement is probably true, but it is not really  
7 applicable, I don't think.

8 CHAIR BALLINGER: And just to comment, I  
9 was surprised.

10 MR. SMITH: Yeah.

11 CHAIR BALLINGER: We were all -- most of  
12 us were on that visit so.

13 MEMBER MARCH-LEUBA: That 40 percent you  
14 mentioned is with what enrichment?

15 MR. SMITH: Well for around 6-1/2 or so  
16 for a four load PWR.

17 MEMBER MARCH-LEUBA: A traditional.

18 MR. HALL: Yes. It is split fee so --

19 MEMBER MARCH-LEUBA: You need to heat 795.  
20 You can do it --

21 MR. SMITH: No, no, no. Not for -- the 8  
22 percent really is something that --

23 MEMBER MARCH-LEUBA: Over the fuel --

24 MR. SMITH: -- would fill up in a BWR peak  
25 10.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER MARCH-LEUBA: Mm-hmm.

2 MR. SMITH: Not an average and not in a  
3 PWR.

4 MEMBER MARCH-LEUBA: I have said often,  
5 and people always laugh when I say it, I am not in the  
6 business of arguing with computer codes. The bottom  
7 line here is we have the validated tools to do this  
8 calculation. If a plant manager wants to load a  
9 36-month cycle, you go and calculate it, you know, and  
10 see what comes out and then with the ching-ching  
11 number for the dollars and tell me whether I want to  
12 do it or not.

13 And from the safety point of view here in  
14 this building, yeah, I'm an NRR member. All I care is  
15 that you will write a license report that says I  
16 satisfied Criteria A, B, C and D. And that's all I  
17 care, right? And, again, I'm not a member of NRR, and  
18 this is my personal opinion. But don't argue with a  
19 computer code. Just go ahead and run it and see what  
20 comes out and tell me how much it costs.

21 CHAIR BALLINGER: Questions? Okay. I'm  
22 still not sure what's next.

23 MR. WELLS: We are going to go to 12 now,  
24 I think, yup, decay heat, which is on Page 176 of the  
25 PDF.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MEMBER MARCH-LEUBA: Could you possibly  
2 tell me how many presentations are there left?

3 MR. WELLS: We're going to probably  
4 scratch --

5 MEMBER MARCH-LEUBA: Is it because there  
6 are two ones? Yeah, I'm for that because -- I'm  
7 running out of batteries here.

8 MEMBER REMPE: Can you give us an idea of  
9 how long this next presentation will be because --

10 MR. WELLS: It won't take very long.

11 MEMBER REMPE: Well, I know that the  
12 subcommittee chairman may have some time constraints.

13 CHAIR BALLINGER: Yeah, no, no. We got  
14 it. I have a -- we have a break at 3:45. That's  
15 scheduled. And so whatever we get done by 3:45, I  
16 will have to leave, but Dave will take over chair. So  
17 there is no issue with respect to --

18 MR. WELLS: I don't think there is any  
19 issue in getting the last one done before 3:45.

20 CHAIR BALLINGER: Okay. All right.

21 MEMBER REMPE: That's where I was going.

22 CHAIR BALLINGER: Great. That's good.

23 MS. AKKURT: Okay.

24 CHAIR BALLINGER: I mean, you guys are  
25 here out of the goodness of your heart. Okay? So it

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 is important that we hear what you have to say.

2 MS. AKKURT: Okay. So in this  
3 presentation, I will give an overview of our ongoing  
4 collaboration for extending the decay heat validation  
5 range. And I don't need to tell this group that decay  
6 heat is really important for the back end, whether it  
7 is your spent fuel pool, rate management, as we have  
8 been discussing, your dry storage, you know, both in  
9 terms of fuel but also canister rate management, you  
10 know, it is proportional temperature and decay heat  
11 and transportation disposal, you know. You have  
12 limits for that and for disposal also, you know,  
13 accurate knowledge of decay heat dictates how many  
14 canisters you can store in your repository.

15 So to give you some background on, you  
16 know, how this collaboration started, all mentioned  
17 about the higher burnup demonstration project and how  
18 the measured temperatures came much lower than  
19 estimated temperatures using different cause and so  
20 on.

21 So at that time EPRI coordinated three  
22 PIRTs in parallel, fuel, thermal modeling and decay  
23 heat. And during this PIRT, you know, we became aware  
24 of some of the unpublished clad decay heat  
25 measurements. But before going to that, you know, the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 PIRT report placed on expert's panel is published.  
2 And normally PIRT reports including the important  
3 parameters ranking and recommendations. But for this  
4 one, since we have many members who are interested and  
5 so on, it was more like overview of the decay  
6 measurements, overview of decay heat calculations,  
7 sources of uncertainties. It is a more comprehensive  
8 report. That's what I am getting to it.

9 So the gaps that were identified is, you  
10 know, we need decay heat measurements, you know, where  
11 we don't have the shorter cooling times here. We are  
12 talking about, you know, one to three years and then  
13 higher burnups. And then also for advanced fuels, you  
14 know, we need some measurements for higher enrichment.

15 MEMBER MARCH-LEUBA: So I don't ask you  
16 the wrong questions, you are worried about long-term  
17 spent fuel pool and canister heated load. You are not  
18 worried about transient decay heat in each cycle.

19 MS. AKKURT: That's clear. The  
20 presentation, when I refer to decay heat here, we are  
21 talking about decay heat beyond one year.

22 MEMBER MARCH-LEUBA: Okay.

23 MS. AKKURT: Yeah.

24 MEMBER MARCH-LEUBA: Because in the  
25 short-term in the first second --

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MS. AKKURT: Yeah.

2 MEMBER MARCH-LEUBA: -- lots of things  
3 change.

4 MS. AKKURT: That is not covered under  
5 this presentation. That is a completely different  
6 thing. We are talking about, you know, longer term  
7 beyond one year because that's usually how it is  
8 divided. For example, Regulatory Guide 354 is valid  
9 for 1 to 100 years, right? And below that is covered  
10 under differently.

11 So this is what we have in terms of  
12 published data, the decay heat range, you know, going  
13 up to 50 and 50, but there are not many points and  
14 also their measurement uncertainty is an issue. And  
15 at the time, in terms of cooling time, it was from  
16 2-1/2 years to 27.

17 So the existing measurements that were  
18 included in the decay heat PIRT were coming from three  
19 sources, CLAB, GE-Morris and HEDL. CLAB is the light  
20 blue. And yes, you can see they are more focused on  
21 lower decay heat, but they have really lower  
22 measurement after.

23 Why are they focused on lower decay heat?  
24 CLAB is in Sweden. They don't have dry storage. They  
25 mainly rely on, you know, centralized wet storage.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 They were doing, you know, decay heat measurements.  
2 These are full assembly decay heat measurements using  
3 calorimeter for their repository. Because for their  
4 repository, decay heat is used in the meter.

5 And GE-Morris have measurements that are  
6 extended, but for some of them the measurement quality  
7 is not very good. And in the PIRT report, we  
8 recommended explaining those from the validation sets.

9 Now when it comes to high decay heat, you  
10 only have six measurements from HEDL. But the  
11 measurement uncertainty is large. I want to say it is  
12 about 10 percent. It is because, you know, no  
13 uncertainty analysis was done. And then they have  
14 published a documents that says it is 10 percent. And  
15 since there is not much documentation it is not like  
16 you can go back and re-evaluate this.

17 And during PIRT, we became aware of some  
18 unpublished CLAB decay heat measurements. They have  
19 measured ones that are on the left. They are the  
20 measurements that were conducted in 2003 and 2004, and  
21 published in a document that has been used by the  
22 global industry, including the regulators, you know.

23 We will find out about the unpublished  
24 decay heat measurements given the fact that the  
25 measurement uncertainties are much lower. Those are

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 uncertain events for 2 sigma as opposed to 1 sigma on  
2 the left. We wanted to see if we can get a  
3 collaborative work initiated to get those published  
4 and make them available for the global industry for  
5 validation purposes. So, you know, those measurements  
6 on the left, with low measurements, the time  
7 measurement uncertainty can be excluded from future  
8 validation sets.

9 And we were able to reach an agreement.  
10 And we signed an agreement in December 2020, and the  
11 agreement includes three tasks. In the previous  
12 slide, I said, you know, at the time we became aware  
13 of six measurements after signing the agreement, CLAB,  
14 ESCP sends us over 150 unpublished decay heat  
15 measurements. And, you know, it was really right  
16 before Christmas is when they delivered, a gift  
17 basically.

18 And after we signed the agreement, we  
19 performed additional measurements. Basically, while  
20 performing additional measurements, we targeted the  
21 higher burnup shorter cooling time and also we  
22 targeted the GE-14 fuel because for any U+, you know,  
23 that's one of the candidates. And CLAB has many fuel  
24 types. It's like, you know, I mean, in terms of, you  
25 know, in terms of, you know, the number of assemblies

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 that are available for your measurement. But for some  
2 reason, they didn't do any GE-14 measurements prior to  
3 that.

4 And so these unpublished measurements, you  
5 know, will be extending the key heat range  
6 substantially and with lower measurement  
7 uncertainties. Cooling down time is going to be  
8 extended substantially, but to be able to do  
9 measurements with, you know, higher decay heat or  
10 shorter cooling time, we basically hit the limit for  
11 the existing calorimeter CLAB.

12 So basically a part of our agreement is  
13 the calorimeter is now being upgraded so it can  
14 enable, you know, affirming measurements. Right now  
15 the original calorimeter for which was used to do  
16 these measurements, we can go to up to 2 kilowatt.  
17 Right now I think we are targeting 4 kilowatt.

18 And using the calorimeter as part of it,  
19 documentation and making the report available, you  
20 know, in a publicly available published EPRI report is  
21 part of the agreement. And we in parallel doing  
22 validation calculations. And we are using two tools,  
23 ORIGEN and also specifics SNF code. And those will be  
24 publicly available too.

25 So for those who are not available, again

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 Sweden relies on centralized wet storage. After the  
2 discharge, it stores -- fuel is stored at the site for  
3 nine months and then it comes to CLAB. They don't  
4 accept any fuel before nine months basically. And  
5 they have over 33,000 fuel assemblies already to  
6 choose from. Your BWRs, PWRs and, you know, some of  
7 the even molten fuel is there, but, you know, they  
8 don't have much information on that.

9 MEMBER MARCH-LEUBA: So you think the  
10 assemblies, they transfer fuel bundles on the active  
11 cooling? I mean, you put them in a track with active  
12 cooling and send them to the facility?

13 MS. AKKURT: They do the dry storage. And  
14 they actually --

15 MEMBER MARCH-LEUBA: In nine months, they  
16 can do dry storage?

17 MS. AKKURT: Yeah.

18 MEMBER MARCH-LEUBA: So what's the problem  
19 with .2 if you can do it in half a core?

20 MS. AKKURT: Big transport. Okay. So now  
21 this is, you know, giving you a snapshot of, you know,  
22 what is included in terms of cooling time versus  
23 measured decay heat. And our report when it is  
24 published, it is going to include the original SKBs,  
25 you know, those decay heats and then it is unpublished

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 measurements, this 166.

2 And this maybe will be extending, you  
3 know, the, you know, hazardous burn range, burnup  
4 range cooling time. And the actuals published, that  
5 is the first SKB report and unpublished is going to be  
6 part of the, you know -- both of them will be part of  
7 the EPRI report basically.

8 And here we are, you know, basically  
9 saying that when we start the measurement campaign,  
10 when the calorimeter is ready, you know, this is the  
11 distribution of number of measurements as a function  
12 of cooling time or decay heat. But we will try to,  
13 you know, fill some of the gaps because in this middle  
14 middle, you know, for longer times, 10 to 24, we have  
15 a lot of measurements for PWR and BWR. And we will be  
16 targeting more, you know, on shorter cooling time and  
17 higher decay heats.

18 So in terms of the uncertainties, you know  
19 uncertainty in the original report was evaluated using  
20 the repeat measurements and components but uncertainty  
21 is being re-evaluated -- actually, Bob Hall took the  
22 uncertainty evaluation portion. To do that, we have  
23 to look at the components of it. As I said, these are  
24 full assembly measurements.

25 So, you know, basically, you have the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 heated measurements and looking at the heat upgrade,  
2 for which you know the power and then you do the full  
3 assembly measurements and look at the heat upgrade but  
4 you know that.

5           So for the uncertainty, you have different  
6 components, and the key ones are your calibration  
7 measurements using the heated and then also gamma  
8 leakage. And ETL uncertainty valuation has been done.  
9 And these are the different components of the  
10 uncertainty, whether it is your heater and your fuel  
11 assembly. Heater and fuel assembly have, you know,  
12 some of the components, you know, some of the same  
13 components, but also some of the difference.  
14 Obviously, when you do the fuel assembly measurements,  
15 you are also having common energy loss and so on.

16           All of those are taken into account and  
17 shown that the measurement uncertainty is actually  
18 lower than what was quoted in the original document  
19 for 05, which is really commonly used around the  
20 world. And this measurement uncertainty evaluation  
21 has been independently reviewed by some experts and  
22 will be reviewed as part of the extended storage  
23 collaboration group in OECD-NEI working group. But,  
24 as I said, another way of checking, we have a number  
25 of repeat and a number of system emission ones. They

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 are on the semantic locations, have similar histories,  
2 burnups and so on.

3 So when we look at the uncertainty ones  
4 and, you know, how the repeated system measurements  
5 are responding to that, they are all -- it's in the  
6 bands with two exceptions. That's in your statistics  
7 anyway. So I don't have, you know, statistically  
8 significant outliers basically.

9 So coming back to, the last is what we  
10 have in the published domain right now. When we have  
11 the EPRI report fully published, it will be used for  
12 validation. In the EPRI report, we will be making  
13 some recommendations for the validation set, and we  
14 are going to recommend removing HEDL measurements,  
15 which have very large uncertainties, from all the  
16 future validation sets for the GE-Morris, you know,  
17 some of the probability ones were already recommended  
18 to be removed. But, you know, if -- I think for the  
19 lower decay heat, they have lower measurements. They  
20 can be kept or if you want to use the entire set like  
21 it's done in cross-counting, you can use some if there  
22 is uncertainty debating or something, you know.

23 And this will, you know, obviously, it was  
24 not done for any U+ field, but I think by extending  
25 the validation range, you know, and with better

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 quality measurements it will benefit because those  
2 uncertainty bands if you go to higher decay heat, they  
3 will be increasing significantly.

4 So in summary, the one benefit of PIRT  
5 was, besides, you know, identification of, you know,  
6 gaps in some, becoming aware of these CLAB  
7 measurements and the follow-up EPRI and ESCP  
8 cooperation, and we will be publishing the measurement  
9 report this year and validation report this year.

10 Calorimeter upgrade is ongoing. Due to  
11 supply chain issues, we had some delays. At the  
12 moment, we are planning on starting the new  
13 measurement campaign next year. And those new  
14 measurements will also be published in a publicly  
15 available form.

16 However, before publishing those, through  
17 ESCP decay heat task force, we are planning some blank  
18 benchmarking. With that, questions?

19 MEMBER MARCH-LEUBA: The issue I have  
20 asked at the beginning of the presentation, what is it  
21 that we want to do? What's our goal?

22 Let me give you multiple choice. A,  
23 validate ORIGEN so I can use ORIGEN to calculate the  
24 decay heat of my particular fuel element, B, validate  
25 a correlation similar to ANSI, validate the ANSI decay

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 heat correlation so I can continue to use it or C,  
2 make a better correlation that maybe includes more  
3 parameters that I can use for making decisions.

4 Having a calorimeter is good, but you  
5 should know what you want to use it for, right?

6 MS. AKKURT: Well, you know, now when they  
7 do the cask loading, right, in the past Regulatory  
8 Guide 354, Rev. 1, was being used, right, which is  
9 very conservative. And, you know, in fact one of our  
10 members were challenged by the regulators saying that  
11 we are using task force, which is using extended  
12 Regulatory Guide 354 and how do you know it is  
13 conservative?

14 At that time, it is a survey comparing to  
15 ORIGEN, you know, basically showing that it is  
16 conservative. But you also find out that it is  
17 significant because in a sense that it was all  
18 estimating 10 to 55 percent depending on the closing  
19 parameters?

20 MEMBER MARCH-LEUBA: How much?

21 MS. AKKURT: 10 to 55 percent, Regulatory  
22 Guide 5.

23 MEMBER MARCH-LEUBA: 65?

24 MS. AKKURT: 10 to 55 percent.

25 MEMBER MARCH-LEUBA: In some cases, what

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 you resolve by a factor of 55 percent.

2 MS. AKKURT: Yeah. So, but now --

3 MEMBER MARCH-LEUBA: It is ORIGEN  
4 calculation?

5 MS. AKKURT: No, no. This is Regulatory  
6 Guide 5 --

7 MEMBER MARCH-LEUBA: Oh.

8 MS. AKKURT: -- for origin of ORIGEN. So  
9 now task force, which is also -- it is usually used by  
10 utilities according to loading campaign, it uses  
11 ORIGEN, right? So now, you know, in terms of  
12 calculation component, you are using a better tool  
13 that, you know, predicts decay heat more accurately,  
14 right?

15 But even if you do the calculation, you  
16 know, you still need to take into account measurement  
17 uncertainty for your final loading. This piece is --  
18 okay, in terms of calculation, yeah, we have better  
19 tools. You can use them, and we can predict this, you  
20 know, within future percentages or better than that.  
21 But still we have to take penalty for measurement  
22 uncertainty.

23 MEMBER MARCH-LEUBA: All right. So the  
24 goal of this exercise is to calculate or apply or  
25 determine which uncertainty you apply to the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 calculations when you load the dry canister. So your  
2 goal was to determine uncertainty. Therefore, using  
3 that very robotic experiment that you have in there  
4 makes a lot of sense.

5 MS. AKKURT: Yeah. So now we have  
6 measurements with better, you know, load --

7 MEMBER MARCH-LEUBA: (Simultaneous  
8 speaking) uncertainty.

9 MS. AKKURT: Total uncertainty because it  
10 has different components, right, you know? Because if  
11 this is my validation set, and my validation set has  
12 very -- my measurement uncertainty, I have --

13 MEMBER MARCH-LEUBA: Your calculation  
14 uncertainty cannot be smaller than the measurement  
15 certainty. You start with a measurement and then you  
16 add. So you are taking the main component of your  
17 uncertainty by spending some money, doing some  
18 intelligent analysis and collecting more data. That  
19 is very applaudable. I mean very good.

20 MS. AKKURT: Thank you. Questions?

21 CHAIR BALLINGER: No questions? Again,  
22 what's next?

23 MR. WELLS: So I'm going to say we take a  
24 break here.

25 MS. AKKURT: Take a break, yes.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 MR. WELLS: There were three more higher  
2 level summary presentations that we had prepared --  
3 well, there were three more that were higher level  
4 summary type. Maybe we can talk, David, on the break  
5 on which one of those, or any of them. We have gone  
6 through all the very detailed technical presentations  
7 at this point.

8 CHAIR BALLINGER: I'm sure I speak for the  
9 other members, and they can speak for themselves.  
10 But, again, the presentations that we have had were to  
11 my mind very instructive.

12 MEMBER MARCH-LEUBA: And very detailed.

13 CHAIR BALLINGER: And very detailed. And  
14 will become useful for us, which is what was one of  
15 our goals going forward, especially on the burnup,  
16 increased enrichment burnup in the XLPR, that kind of  
17 --

18 MEMBER MARCH-LEUBA: Especially --

19 CHAIR BALLINGER: -- discussion because we  
20 hadn't seen that before, and we expect that we will.

21 MEMBER MARCH-LEUBA: May I suggest that we  
22 take public comments now in case we convince Dave to  
23 quit early after you are gone?

24 CHAIR BALLINGER: I mean, I'm easily  
25 convinced. Okay. So are there any members of the

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 public that would like to make a comment? If there  
2 are, can you state your name and make your comment,  
3 please? Okay. Hearing none, we can take a break and  
4 then you can negotiate --

5 MEMBER REMPE: After you leave.

6 CHAIR BALLINGER: -- what you do.

7 (Whereupon, the above-entitled matter went  
8 off the record at 3:37 p.m. and resumed at 3:55 p.m.)

9 MEMBER PETTI: Okay. We're back. This is  
10 Dave Petti who is filling in for Member Ballinger.  
11 And we are going to hear one more presentation on the  
12 Collaborative Research on Advanced Fuel Technologies  
13 known as CRAFT.

14 MR. MUFTUOGLU: Yes.

15 MEMBER PETTI: Go ahead.

16 MR. MUFTUOGLU: Yes. My name is Kurshad  
17 Muftuoglu. I am technical executive with the Fuel  
18 Reliability Program at EPRI. And today I am going to  
19 talk about the CRAFT. And it stands for, as you said,  
20 Collaborative Research on Advanced Fuel Technologies  
21 for LWRs, PWRs and BWRs.

22 Next slide. And then we can move one  
23 more. So CRAFT takes its mandate from the NEI working  
24 group and the task force. The purpose of the CRAFT is  
25 to foster a research and collaboration environment

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 while we bring the various subject matter experts from  
2 stakeholder organizations together and collect the  
3 resources on research and optimize the research and  
4 development efforts by bringing everybody on the same  
5 table.

6 It emulates the Extended Storage  
7 Collaboration Program, ESCP. Today we had a  
8 presentation on that one, however, due to time  
9 restrictions, we will not get on that one. But it has  
10 a steering committee. And under that, we have  
11 technical expert groups that collaborate on various  
12 topics.

13 We can move to the next slide. So  
14 basically the objectives, the main objective is to  
15 bring subject matter experts from particular U.S.  
16 organizations and as appropriate, international  
17 organizations together, and these are the stakeholders  
18 basically working on the high burnup, high enrichment  
19 area and advanced fuel technologies areas. And  
20 another objective is to identify both short and  
21 long-term options and recommendations to support the  
22 highest priority associates to licensed methodologies  
23 and ultimately put them to use in the U.S.

24 And to do that we support gap analysis and  
25 the PIRT process. And ultimately the work products

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 are communicated by synthesizing the research results  
2 from technical basis and distribute them as targeted  
3 deliverables.

4 Basically, we bring to the table under  
5 EPRI's coordination DOE National Labs. The NRC is  
6 also a participant. The fuel vendors are participant,  
7 and the utilities are also participants of CRAFT.

8 Next slide. So the main technical focus  
9 until recently has been on the advanced fuel  
10 technology deployment and particularly the fuel  
11 fragmentation relocation and the dispersal topic that  
12 is an important aspect of moving to higher burnup. It  
13 has been the main focus of CRAFT until now.

14 And in order to address those under the  
15 steering committee, two technical expert groups were  
16 formulated, one of whom is the General Guidance and  
17 Analysis Committee Technical Experts Group, GGA and  
18 the other one is Fuel Performance and Testing, FPT,  
19 Technical Experts Committee.

20 Move to the next slide. By using an issue  
21 tracking matrix, we have identified the important  
22 research areas, and they have focused on enabling the  
23 research in their organizations and incorporating with  
24 others.

25 So this slide shows the overall CRAFT

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 sector and the key stakeholder interfaces. As I have  
2 indicated, we work under NEI working group priorities,  
3 set of priorities, licensing safety analysis. The  
4 Safety Benefits Task Force identifies the major  
5 priorities for the U.S. industry moving to higher  
6 burnup, higher enrichment and advanced fuel  
7 technologies. And on as needed basis, we collaborate  
8 with the U.S. DOE programs advanced fuel campaign,  
9 light-water reactors, sustainable program, nuclear  
10 energy analysis and modeling simulation, advanced  
11 modeling simulation means program.

12 And in a true memorandum of understanding,  
13 NRC also participates in the CRAFT organization. They  
14 have representations both from NRR and the research  
15 branch. And on as needed basis, they can weigh in,  
16 but typically they can also recuse themselves. And  
17 they do not do any regulation during these regulatory  
18 activities during these deliberations.

19 They are an important and a very valuable  
20 interface to have, the NRC, so that they can be kept  
21 up-to-date with the research that supports the  
22 regulatory activities as well.

23 Under the steering committee, the steering  
24 committee has membership from, as I mentioned earlier,  
25 from vendors, fuel vendors, fuel suppliers, utilities.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 EPRI is leading DOE and National Labs and Oak Ridge  
2 and INL. And under that, we have the General Guidance  
3 and Analysis and Fuel Performance Testing Technical  
4 Expert Groups.

5 Just recently, we have also formed a new  
6 technical expert group that started to work on time  
7 and temperature area.

8 Moving on to the next slide.

9 MEMBER REMPE: I'm going to stop you  
10 there.

11 MR. MUFTUOGLU: Sure.

12 MEMBER REMPE: Again, this isn't a safety  
13 issue, but I'm just puzzled in knowing what I know  
14 about how OECD projects work and how you've got to  
15 sign agreements and you can't distribute what you've  
16 learned from OECD project to other folks who aren't  
17 part of the project, I'm just kind of puzzled about  
18 this organizational structure and how that would work.

19 Were you getting input from the OECD  
20 projects or the other international projects? It just  
21 seems a little different than what I've seen in other  
22 things. And who is in charge of this -- is this an  
23 EPRI run program?

24 MR. MUFTUOGLU: So EPRI coordinates it.  
25 We are running the program. And the stakeholders that

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 I have mentioned, industry stakeholders, DOE, NRC and  
2 fuel vendors, they are participating on their  
3 willingness voluntarily.

4 So we have a charter that sets up the  
5 rules of how we are going to run things, how we are  
6 going to generate consensus. And it is all research,  
7 technical research oriented. It's all on technical  
8 issues. There is nothing proprietary. Everybody  
9 understands that.

10 MEMBER REMPE: So give me an example like  
11 this. A representative from OECD-NEA who may be  
12 involved in other OECD projects --

13 MR. MUFTUOGLU: Right.

14 MEMBER REMPE: -- comes and they just  
15 review the things? Are they giving input from those  
16 other projects to it?

17 MR. MUFTUOGLU: That interface with the  
18 international participants is there, but we don't have  
19 any international focus so far. It has been only in  
20 the U.S. focus. And we did not have any conflict or  
21 any of these questions never came up until now.

22 MEMBER REMPE: Okay. So no one from OECD  
23 is coming in?

24 MS. AKKURT: Can I just jump in here? So  
25 for, you know, those programs, OECD programs, they

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 have their own membership, like agreements and  
2 limitations and so on as you are saying. And then,  
3 you know, EPRI has similar things as well that are  
4 available with our members and everything.

5 So we get those representatives to give an  
6 overview of their programs in our meetings. So that  
7 the whole community attending the CRAFT is aware of  
8 those OECD programs. They are not necessarily sharing  
9 the reports or details.

10 MEMBER REMPE: Right.

11 MS. AKKURT: But they provide those  
12 overviews so that -- and then we kind of compare it to  
13 what else is going on. Like we have a -- I mean, this  
14 is kind of a collaboration on what is going on in that  
15 particular issue everywhere in the world basically.

16 MEMBER REMPE: Okay.

17 MS. AKKURT: But also it will depend on,  
18 you know, how the coordination and activities and  
19 roles and responsibilities are divided as Erich  
20 mentioned, you know, on the storage collaboration  
21 program.

22 (Operator speaking.)

23 MS. AKKURT: We don't do --

24 (Operator speaking.)

25 MS. AKKURT: -- a national focus. You

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 have participation from 23 countries. But the rule of  
2 the game is if you want to get results, you need to  
3 provide results. What this IP is your design and so  
4 on. But for the results to be combined and shared or  
5 shared, you know, reviewed, everyone needs to bring  
6 something to the table.

7 MEMBER REMPE: I get it if it was a  
8 particular country. But I'm just thinking about these  
9 memos of agreement are assigned by folks for OECD  
10 projects. And I'm wondering how that can happen. But  
11 if it's at a high level, there are certain things that  
12 are approved by the management board of the individual  
13 PRG of the individual projects. So I can understand  
14 how this (simultaneous speaking).

15 MS. AKKURT: In OECD, NEI, and many other,  
16 all those kinds of organizations participate, you  
17 know, and those we have in other countries. Yeah.  
18 ESCP is more intended -- it becomes more international  
19 focus. We started in the U.S. but now we have  
20 representation from 23 countries, from various social  
21 organizations and utilities, vendors, regulators, you  
22 know, or others, as such.

23 MEMBER REMPE: Thank you.

24 MR. MUFTUOGLU: So the idea is to generate  
25 and provide a collaborative research environment.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 When we hold our yearly meetings they also come and  
2 present their high level studies.

3 Next slide, thank you. And on this one,  
4 as I have indicated earlier -- just ignore that?  
5 Okay.

6 The focus has been on the fuel  
7 fragmentation and relocation and the dispersal and the  
8 issue side of the matrix item stands for that  
9 identified particular aspects of it, particular tasks  
10 underneath that needed to be looked at, and these were  
11 to be divided up between the two technical expert  
12 groups, including the EPTA and GGA technical expert  
13 group.

14 Fuel fragmentation portion, which takes  
15 more testing into account, had more activities under  
16 FPT tag. Dispersal, however, on the other hand, is  
17 more -- the approach is more ineligible. And so the  
18 GGA tag focused on that one. The fuel location is  
19 shared between the two of them.

20 I'm not going to go into the details of  
21 the activities itself so we can move to the next  
22 slide. Some of the recent developments, last year we  
23 had spoken to the development of the DOE-AFC advanced  
24 fuel campaign LOCA plan that was developed by the  
25 National Labs and DOE. It is an important piece of

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 work, which provides a combined integral and  
2 semi-integral look at this plan. And it covers many  
3 aspects of the fuel fragmentation and the dispersal  
4 topic and also identified the research gaps under  
5 that. And CRAFT provided comments on the report and  
6 facilitated the comment resolution. And it was issued  
7 last September and now the work by the National Labs  
8 are initiated according to this plan.

9 Next slide. Another development, as I  
10 have mentioned earlier, is the time and temperature  
11 criteria. I will get back to that. Another area we  
12 have focused was after the NRC's 2021 13 reel was  
13 issued. A look at the data assessment and the data  
14 needs on the technical panel assessment was performed  
15 by EPRI. CRAFT took that report and performed an  
16 official review of that published white paper. Now we  
17 are working on advancing the comments generated by  
18 CRAFT community on the white paper.

19 The time and temperature criteria, it is  
20 a new technical expert group that has been generated.

21 Next slide. So it is going to be a focus  
22 area for this year particularly. Just briefly  
23 speaking, time and temperature is a post-BRB and post  
24 dry-out conditions where fuel can survive getting the  
25 past critical heat flux values. So it has potential

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 for power-up rates as well as the fuel utilization  
2 benefits were recognized by the industry and  
3 prioritized.

4 And we have put together a new technical  
5 expert group to develop a material testing plan. And  
6 that testing plan will include the definition of the  
7 testing facility, define the testing protocol and  
8 identify the materials, both irradiated and fresh fuel  
9 coated, uncoated, et cetera.

10 That brings me to the last slide, the  
11 summary of CRAFT's overall provider forum for various  
12 stakeholders by bringing them on the same table into  
13 research collaborative environment. And we focus on  
14 the issues that are relevant to the deployment of the  
15 advanced fuel technologies and also particularly focus  
16 on the plant safety and operational flexible  
17 improvements including power upgrades and extended  
18 cycles and basically we try to keep aligned with the  
19 industry needs, working closely with the NEI safety  
20 benefits and the working group on the ATF. And that  
21 is my last slide. Thank you.

22 MEMBER PETTI: Questions, members,  
23 consultants online? Okay. I don't see any. I want  
24 to thank you for coming. Very informative. We  
25 covered most of the waterfront, I think, a whole swath

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE., N.W.  
WASHINGTON, D.C. 20005-3701

1 of things. So that's a pretty typical place to ask so  
2 it is good to hear from you guys on that so.

3 MEMBER REMPE: Even though we had public  
4 comments a few minutes ago, there has been another  
5 presentation. Maybe you ought to give it a run again.

6 MEMBER PETTI: Okay. Any member of the  
7 public that has a comment, unmute yourself, state your  
8 name and your comment. I'm not hearing anything then  
9 I --

10 MEMBER MARCH-LEUBA: There may be somebody  
11 on the chat.

12 MEMBER REMPE: It is probably is from a  
13 while ago or something.

14 MEMBER PETTI: Yeah. Okay. Then with  
15 that, I call the meeting to a close. We are recessed.  
16 Thank you.

17 MEMBER DIMITRIJEVIC: Thank you. Safe  
18 travels.

19 (Whereupon, the above-entitled matter went  
20 off the record at 4:14 p.m.)

21

22

23

24

25

# Fuels and Chemistry

## Updates on Topics of Interest to ACRS

**EPRI Fuels and Chemistry Department Staff**

Dan WELLS, PhD – Director, Fuels and Chemistry

**Advisory Committee on Reactor Safeguards: Fuels,  
Materials, and Structures Subcommittee Meeting**

18 May 2023

Washington, DC, USA



[www.epri.com](http://www.epri.com)

© 2023 Electric Power Research Institute, Inc. All rights reserved.



# EPRI Nuclear Fuels and Chemistry

Research and development supporting maintenance of the primary containment boundaries, optimized and efficient operation, cost effective waste disposal and protection of workers and the public



**Chemistry &  
Radiation Safety**



**Operating  
Nuclear Fuels**

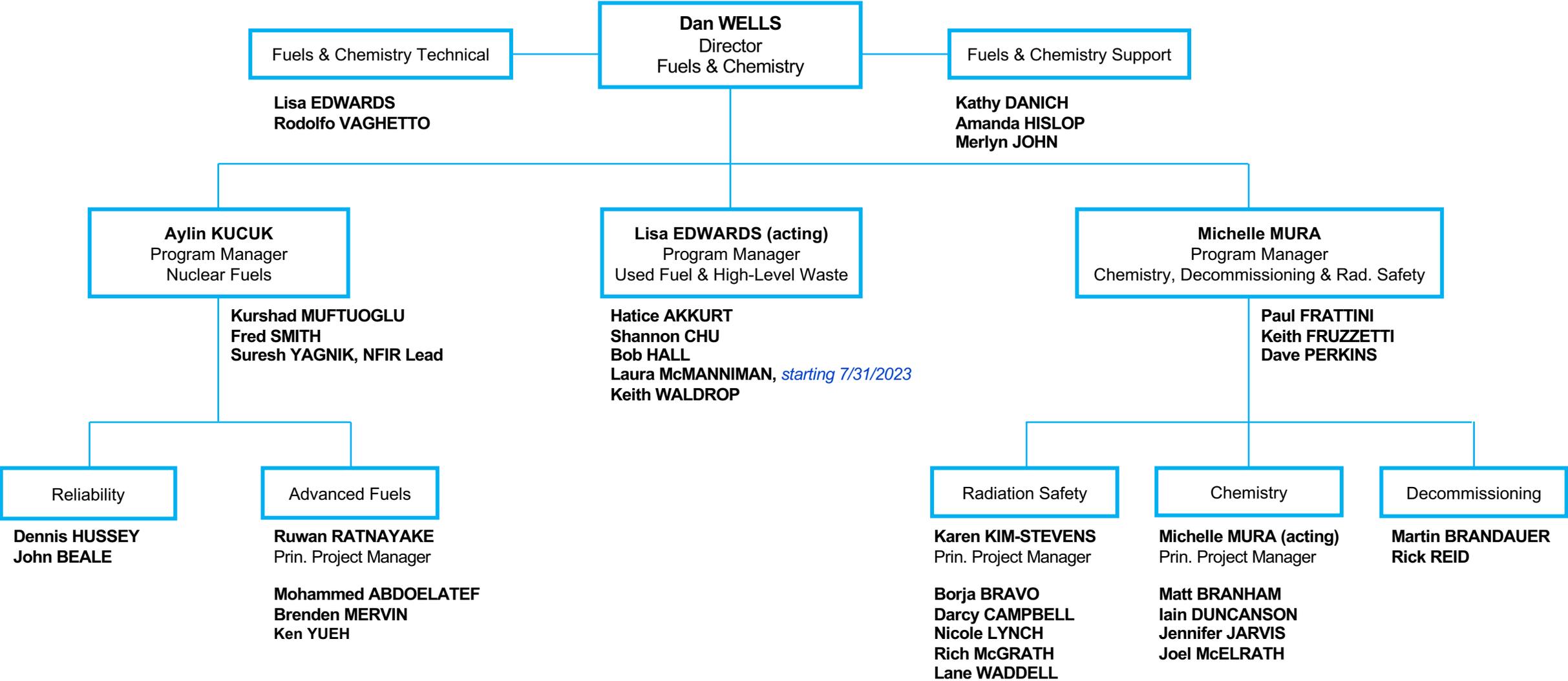


**Used Fuel / High  
Level Waste**



**Decommissioning  
(Supp)**

# Fuels & Chemistry Organization Chart



# Advisory Committee on Reactor Safeguards – Agenda (1/2)

*Fuels, Materials, and Structures Subcommittee*

18 May 2023 (AM)

Item	Topic	Presenter(s)	Time (ET)
1	Opening Remarks and Objectives	Prof. Ballinger, ACRS	8:30 – 8:35 a.m.
2	EPRI Opening Remarks	Dan Wells, EPRI	8:35 – 8:40 a.m.
3	KOH for PWR RCS pH Control: Radiological Impacts	David Perkins, EPRI	8:40 – 9:05 a.m.
4	EPRI Fuel Reliability Program Overview	Aylin Kucuk, EPRI	9:05 – 9:35 a.m.
5	xLPR Methodology – Probabilistic Fracture Mechanics for PWR Piping	Nathan Glunt, EPRI Marcus Burkardt, Dominion Engineering	9:40 – 10:20 a.m.
	<b>Break</b>		10:20 – 10:35 a.m.
6	EPRI Alternative Licencing Strategy – New Approach to Address FFRD	Fred Smith, EPRI	10:35 – 11:10 a.m.
7	Fuel Fragmentation Threshold	Suresh Yagnik, EPRI	11:10 – 11:35 a.m.
8	Atomistic Modeling of Cladding Coating Behavior	Erich Wimmer, MDI	11:35 – 12:00 p.m.
	<b>Lunch</b>		12:00 – 1:30 p.m.

# Advisory Committee on Reactor Safeguards – Agenda (2/2)

*Fuels, Materials, and Structures Subcommittee*

18 May 2023

Item	Topic	Presenter(s)	Time (ET)
9	Collaborative Research on Advanced Fuel Technologies (CRAFT)	Kurshad Muftuoglu, EPRI	1:30 – 1:45 p.m.
10	EPRI Used Fuel High Level Waste Program Overview	Bob Hall, EPRI	1:45 – 2:00 p.m.
11	SFP Criticality for ATF/HE/HBU: Depletion Uncertainty and Criticality Code Validation	Hatice Akkurt and Bob Hall, EPRI	2:00 – 2:35 p.m.
12	Decay Heat: EPRI-SKB Collaboration for Extending Validation Range	Hatice Akkurt, EPRI	2:35 – 3:00 p.m.
13	Scoping Analysis for Decay Heat and Radiation Dose for ATF/HE/HBU	Bob Hall, EPRI	3:00 – 3:30 p.m.
14	Extended Storage Collaboration Program (ESCP)	Hatice Akkurt, EPRI	3:30 – 3:45 p.m.
	<b>Break</b>		3:45 – 4:00 p.m.
15	Open Discussion	All	4:00 – 4:30 p.m.
16	Committee Discussions	Prof. Ballinger	4:30 – 4:40 p.m.
17	<b>Adjourn</b>	All	4:40 p.m.

# KOH Update

## Radiation Protection, and Radioactive Waste Update

David Perkins  
Technical Executive, Senior

KOH Project Manager  
Keith Fruzzetti, PhD  
Technical Executive, Senior  
May 2023



# Potassium Hydroxide: Why?

- **Eliminate vulnerability to enriched Li-7 supply**
  - Limited production (China and Russia)
  - Increased demand (flexible operation, new PWRs, molten salt reactors)
- **Significantly reduced operational cost**
  - Estimated savings per year of ~\$100k/unit (2016 estimate)
- **May be more beneficial for fuel**
  - Potentially lower corrosion
  - Potential mitigation strategy for Crud Induced Power Shift (CIPS)

House Committee on  
**Science, Space, & Technology**  
Eddie Bernice Johnson  
Ranking Member

Home About Hearings & Bills News Subcommittees Contact Us

Home » Media Center » Press Releases

**GAO Raises Questions about Adequate Supply of Lithium-7 for Nuclear Power Reactors**  
October 09, 2013

**Nuclear Energy**

Supply Chain Deep Dive Assessment  
February 24, 2022

U.S. Department of Energy Response to Executive Order 14017, "America's Supply Chains"

## Most Important Supply Chain Issues

**Current Large Reactors: Enriched Lithium (#2)**

**Advanced Reactors: Lithium/Enriched Lithium (#4/#5)**

**Significant value with KOH. Successfully used in VVERs for Decades.**

# KOH for Western-design PWRs: Generic Testing & Assessments

SCOPE

## Materials

- Initiation & CGR Testing
  - Non-irradiated
    - Stainless Steel (SS), Alloy 600, Alloy A-286 and Alloy 182 (CGR)
  - Irradiated
    - Stainless Steel

## Fuels

- Vendor assessments
- Experimental Loop testing
- Experimental Autoclave testing

## Chemistry

- System review and impacts
- High temperature chemistry (MULTEQ)
- Purity specifications
- Multiple alkali modeling and control

## Radiation Safety

- Activation species and dose pathways
- Impact on plant radiation fields
- Effluent and radioactive waste handling

STATUS

- All testing completed with one exception.
- SS in crevice chemistry **expected to complete in second-half of 2023.**

- Vendor assessments and both planned testing programs completed.
- Further WALT Loop testing on-going.

- Assessments completed
- NSSS Vendor reviews completed
- VVER experience leveraged
- Station is working through the 10 CFR 50.59 review process to support implementation

**Needed Testing and Assessments Expected to Complete in Second-half of 2023**

# KOH For Western Style Pressurized Water Reactors

## Chemistry and Radiation Safety Overview

**Needed materials and fuels testing and assessments are expected to complete in the second half of 2023**

### Chemistry

- System review and impacts
- High temperature chemistry (MULTEQ)
- Purity specifications
- Multiple alkali modeling and control

### Radiation Safety

- Activation species and dose pathways
- Impact on plant radiation fields
- Effluent and radioactive waste handling



### Chemistry and Radiation Safety Big Picture

- Assessments completed
- NSSS Vendor reviews completed
- VVER experience leveraged

# Chemistry and Radiation Safety Scope

## Chemistry Control

CVCS Bed Operation with K and Li

- Completed. Entirely feasible and the VVER experience was very helpful. (3002010650)

## Radio-isotopic Generation

Evaluate KOH Chemical and Sodium Impurity

- Completed. No significant issues. (3002015902)

## NSSS Vendor Reviews

Westinghouse and Framatome Assessment on Potential Primary System Impacts

- Phase 1 completed. (3002018427 and 3002018429)
- Phase 2 with Westinghouse completed, to address identified gaps from Phase 1. (3002020959)

## MULTEQ CW Tools

High Temperature Chemistry Thermodynamics

- Several important potassium species added in V9 (e.g., KOH,  $\text{KB(OH)}_4$ , KCl). Additional species to be added in V10.
- pH Calculator updated in ChemWorks Tools v4.3 (3002016775)

## VVER Experience

Literature Data and Operating Experience

- Significant literature data gathered and assessed.
- VVER operating experience assessed. Supports monitoring plan for demonstration.

## Plant Demonstration

Support and Assessment (3 cycles)

- Identify and work with KOH demonstration unit.

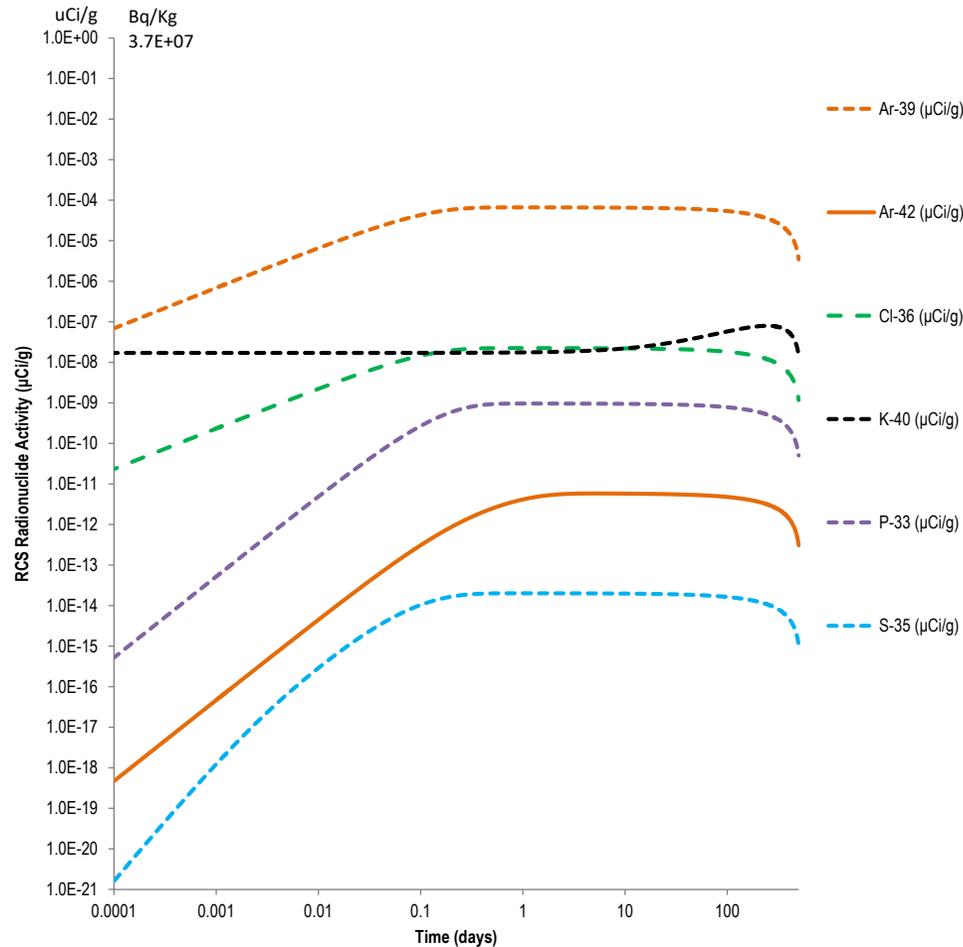
**Chemistry and Radiation Safety results indicates no significant challenges.**

# Chemistry Control

- Mixed alkali chemistry (K and Li) has comparable  $\text{pH}_T$  values to Li-only on an equivalent molal basis (based on analysis using MULTEQ)
  - In the limit of K-only control, the maximum  $\text{pH}_T$  deviation (i.e., to same molal Li) is 0.03 units
  - Although K binds more strongly than Li to cation resin, exchange is one-for-one (ion-to-ion)—having an equivalent effect on  $\text{pH}_T$
  - Use an “equivalent lithium” approach for pH Control
- Additional chemistry monitoring
  - K, Na
- Chemical Volume and Control System (CVCS) resin management being addressed
- Room temperature conductivity is higher with potassium present
  - Important if using conductivity to monitor for impurities

**Chemistry Control with K and Li is Equivalent to Li-only**

# KOH and Radionuclide Generation



- Six have half-lives ( $t_{1/2}$ ) greater than 24 hours (Ar-39, Ar-42, Cl-36, K-40, P-33, and S-35)
  - Maximum total coolant activity from these is predicted to be  $< 3.7 \text{ Bq/g}$  ( $1\text{E-}04 \text{ µCi/g}$ )
  - Total estimated activity of these six radionuclides is less than 0.1% of the total RCS Activity.
- From the Radiation Protection perspective, K-40 can present unique challenges.
  - Considered a natural isotope
  - Potential impacts / issues raised:
    - Whole body counting and other release monitors
    - Effluents
    - Waste disposal
    - Dose impacts

# KOH Radiation Safety White Paper

EPRI R&D performed a comprehensive review and assessment of chemistry and Radiation Safety factors (3002015902)

Plant-specific application items identified by the demonstration Plant Radiation Protection staff are being addressed with EPRI support.



**Nuclides of Concern**



**Passive Monitoring**



**Declared Worker**



**Radioactive Waste**



**Dose Rate Impacts**



**Submersion Dose**



**Instrument Responses**



**Contamination Surveys**



**Staffing Concerns**



**Personnel Monitors**



**Air Sampling**



**Equipment Monitor**



**Whole Body Counting**



**Lens of Eye**



**Skin Dose**



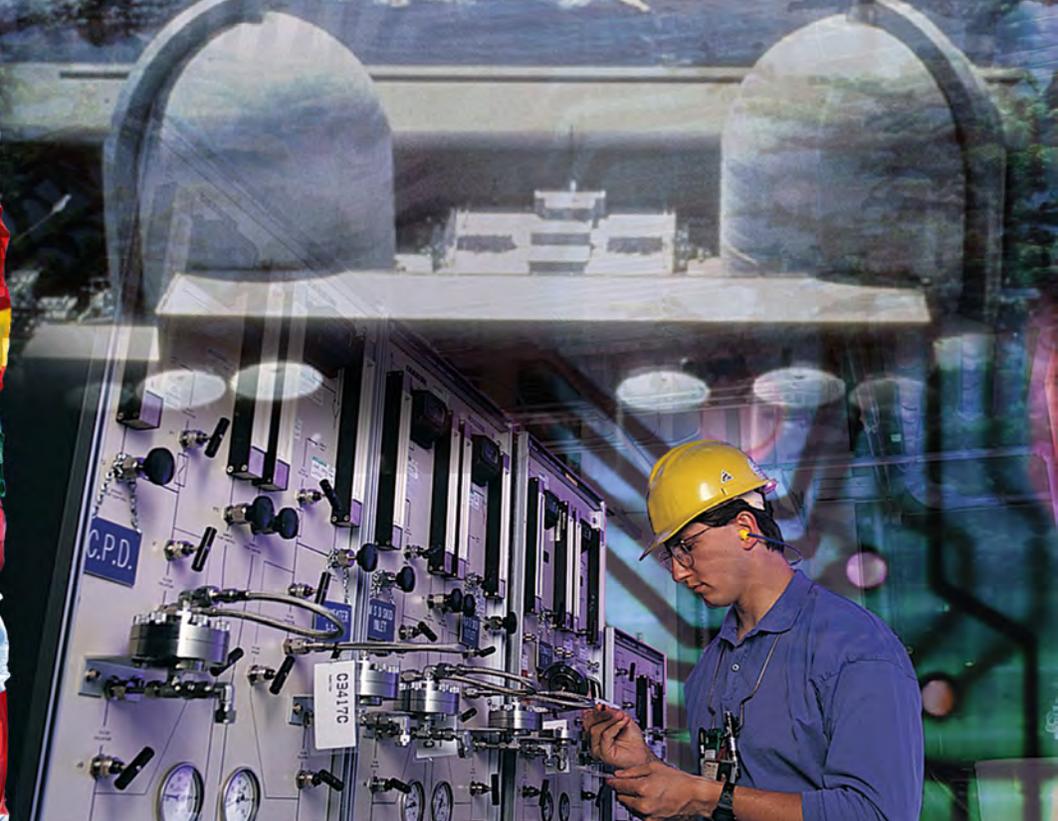
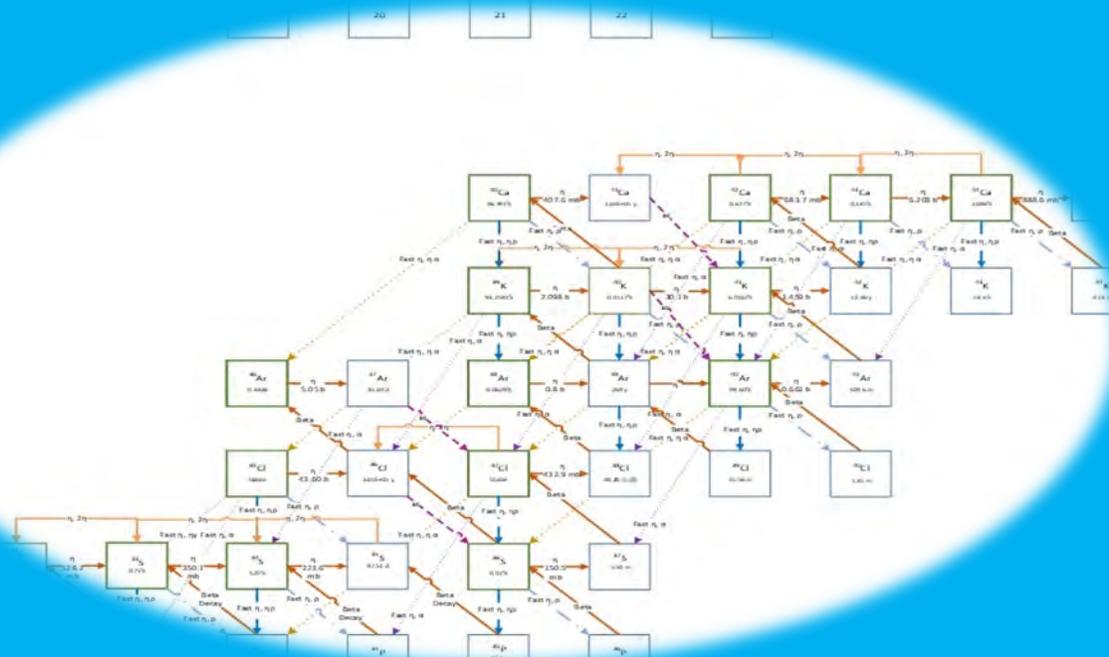
Completed



In progress

# KOH Radiation Safety White Paper

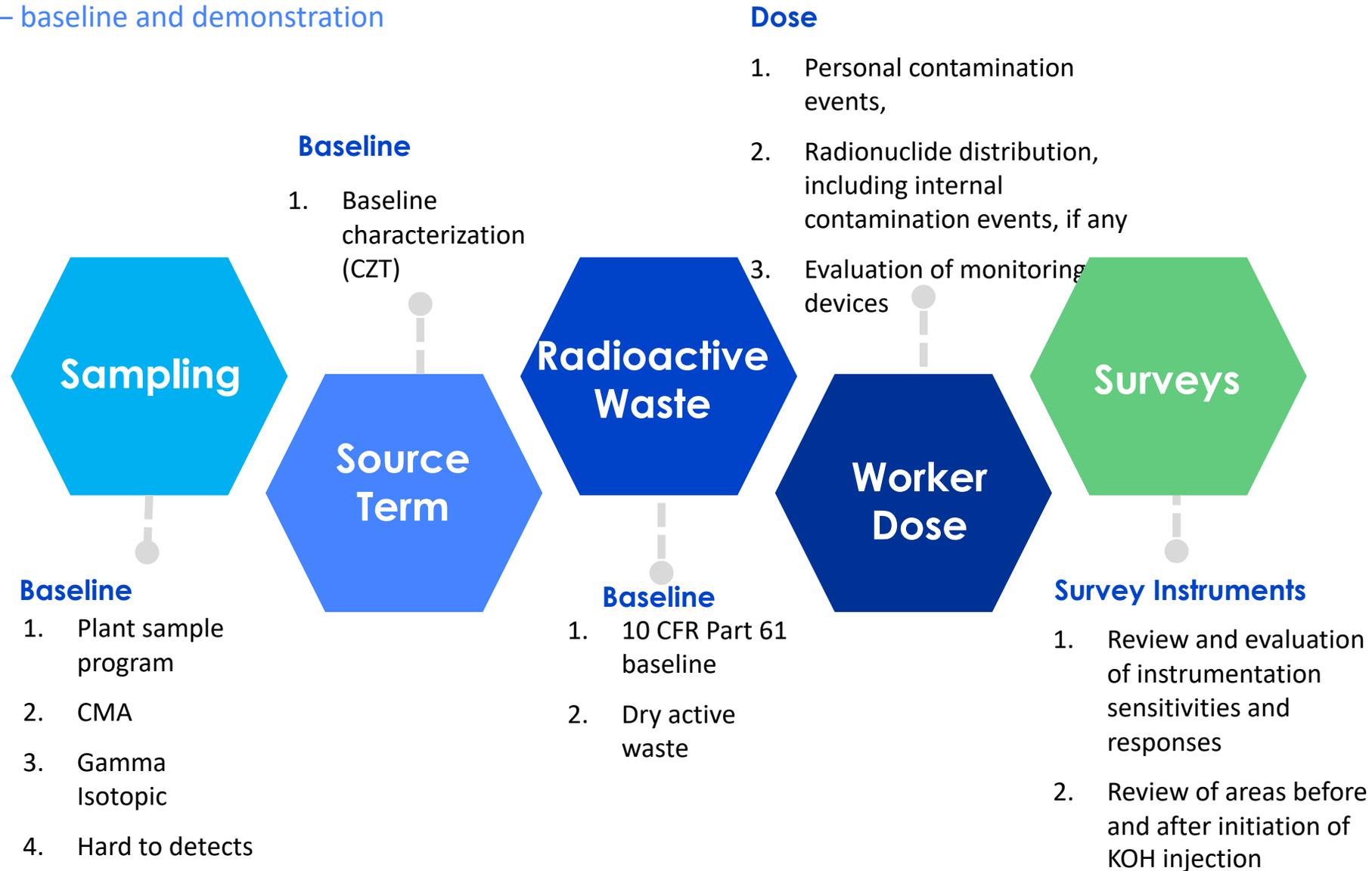
## Radionuclides of Concern Review



- ✓ Verify that gamma spectroscopy systems libraries have the appropriate radioisotopes
- ✓ Prior to KOH addition, establish baseline levels of these radionuclides in reactor coolant and support systems, reactor cleanup resins and filters, effluents, and radioactive waste.
- ✓ Analyze reactor coolant, cleanup systems, and the waste and effluent streams that are generated in the beginning, middle, and end of the cycles.

# KOH Radiation Safety White Paper Update

## Monitoring – baseline and demonstration

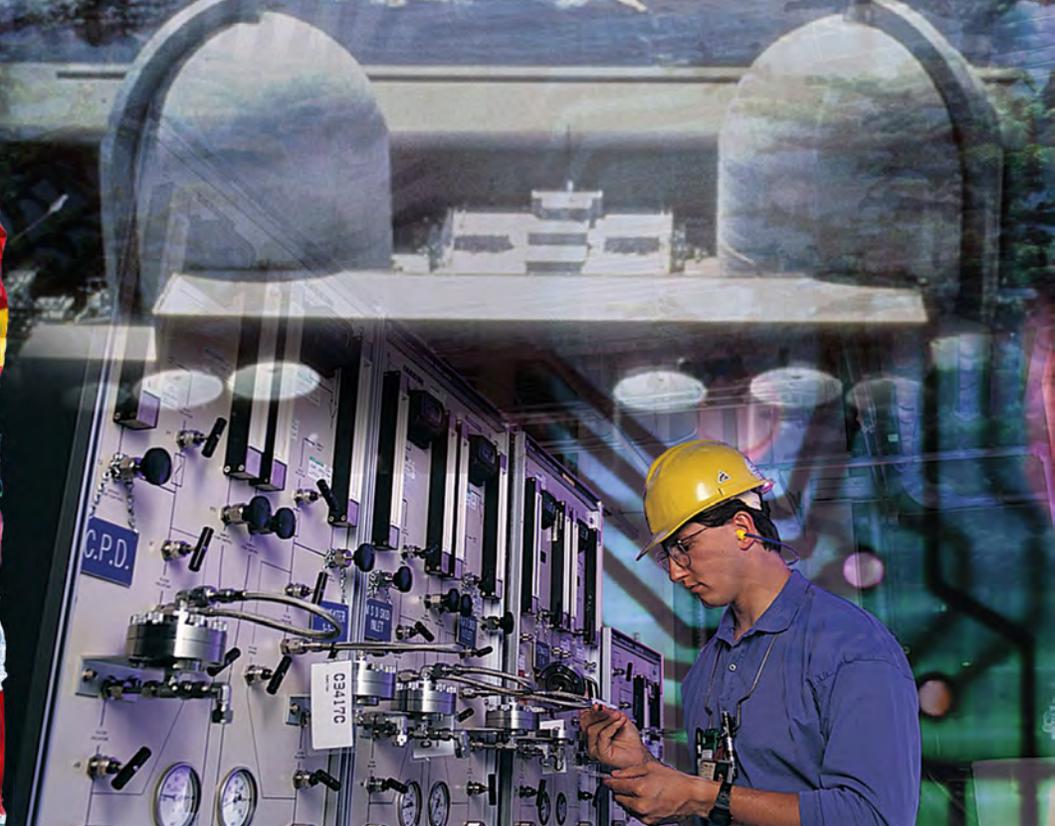


\*LILW: Low and Intermediate Level Waste

# KOH Radiation Safety White Paper

## Instrument Verification and Preparations

Letdown  
Line



- ✓ Determine plant systems or areas that may be subject to having only pure beta emitters and establish process controls for these areas to ensure appropriate monitoring is conducted.
- ✓ Establish procedure controls to use a GM detector or other large area proportional counter to perform a survey of items from these areas for unconditional release.
- ✓ Evaluate if the tool equipment monitor setpoints should be adjusted to account for non-gamma emitting isotopes.

# Station Radiation Safety KOH White Paper Summary

Sequoyah station radiation protection staff have ongoing work activities and addressing the KOH White Paper activities and moving through the different area.



## Gamma Spectroscopy System Updates

- Whole body counter updates completed
- Gamma spectroscopy system update in progress



## Dose and Effluent System

- DAC values are reviewed and updated for the dose management system.
- HIS-20 updates in progress



## Radiation Fields

- CZT data collected from outage and under review
- Baseline chemistry data collection in progress



## Bioassay Program

Working with vendor to ensure offsite bioassay program is aligned with the potential new radionuclides





**Together...Shaping the Future of Energy<sup>®</sup>**



# EPRI Fuel Reliability Program

## Overview

Aylin Kucuk  
Program Manager, Nuclear Fuels, EPRI

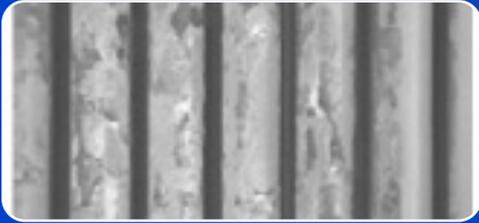
U.S. NRC ACRS Fuels, Materials, and Structures  
Subcommittee Meeting  
Bethesda, MD  
May 18, 2023



# EPRI Fuel Reliability Program

- Support current operating fleet to minimize and avoid fuel failures and fuel performance issues
  - Develop and update Fuel Reliability Guidelines, Tools, and Handbooks - technical basis and operating experience
  - Inform industry to support change management
- Perform research to capture cost and operational efficiencies
  - ATF
  - HBU/LEU+
  - KOH
  - Cycle Length Extension
  - Power Uprates
  - Time-at-Temperature
  - Flexible Power Operation
  - Control Rod/Blade
  - NDE
- Develop technical basis for regulatory and safety issues
  - ATF
  - HBU/LEU+
  - FFRD

# FRP Research Focus Areas



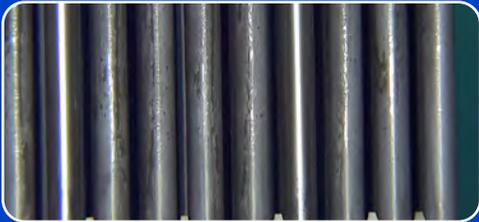
## PWR Crud and Corrosion (PWR C/C)

- CIPS and CILC Risk Management, BOA CIPS/CILC Risk Assessment Tool
- KOH, PWR Fuel Cladding Corrosion and Crud Guidelines



## BWR Crud and Corrosion (BWR C/C)

- BWR Fuel Cladding Corrosion and Crud Guidelines, CORAL Crud Risk Assessment Tool
- Water Chemistry Changes (i.e. Early/Continuous OLNC)



## Advanced Fuel Technologies (AFT)

- Evaluate fuel reliability and performance benefits of ATF/HBU/LEU+, updates EPRI guidelines, tools, and handbooks for implementation of ATF/HBU/LEU+,
- Perform research to enable safety and economic benefits of ATF/HBU/LEU+

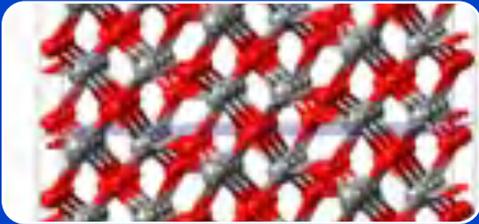


## Debris-Induced Failure Mitigation (DFM)

- Guidance and Training on FME Control
- Research that enables debris-resistant fuel cladding

LEU+ is 5-8%

# Con't FRP Research Focus Areas



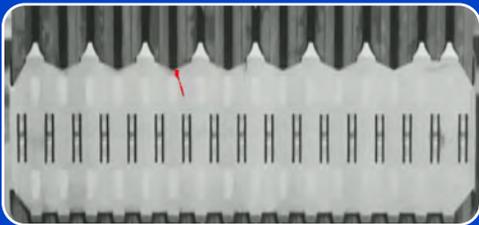
## Study of Hydrogen Impacts in Zirconium (SHIZAM)

- HPU Measurement Data and Margin Assessments, Scientific Understanding of HPU and Hydrogen Impact Mechanisms
- Design and Operation Guidance Handbook



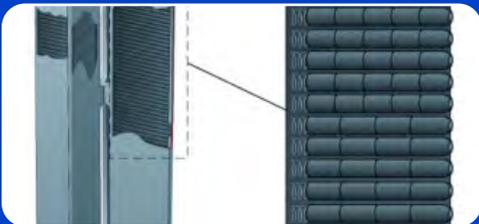
## Guidance Methods and Tools (GMT)

- Fuel Surveillance and Inspection Guidelines, PCI Guidelines, FRED Database
- Fuel Failure Monitoring and Evaluation Handbook, Fuel Design Handbook, Falcon – Fuel Performance Tool



## Non-destructive Evaluation (NDE)

- Failed Fuel Identification, Anomaly Identification and Characterization
- Fuel Cladding Corrosion, Crud, and Hydrogen Content Measurements in Poolside (F-SECT Oxide and F-SECT Hydrogen)



## Control and Structural Component Integrity (CCI/SCI)

- BWR CRB Leakage and Lifetime Prediction Improvements, PWR Control Rod Wear Modeling
- Additive Manufacturing of Fuel Components (i.e. debris filters)

# ATF Concepts in US – Near-term and Long-term Plan

Framatome	General Electric	Westinghouse
Cr-coated M5 Cladding (PWRs) Proprietary Coated Cladding (BWRs)	Coated Cladding (ARMOR™) (BWR)	Cr-coated ZIRLO cladding (PWR)
Doped UO <sub>2</sub> for improved thermal conductivity and fuel performance	FeCrAl Cladding (IronClad™) (BWR)	Doped UO <sub>2</sub> (ADOPT™) and high-density fuels with improved thermal conductivity (UN)
High Burnup (75 GWD/MTU)/LEU+	High Burnup (75 GWD/MTU)/LEU+	Interim Burnup (68 GWD/MTU) and High Burnup (75 GWD/MTU)/LEU+
Long Term: SiC Cladding	Long Term: Oxide Dispersion-strengthened (ODS) Variants of FeCrAl for improved strength, Advanced Ceramic Fuels (next generation dopants)	Long Term: SiC Cladding

LEU+ = 5-8%

**Each vendor is developing near and long-term ATF cladding concepts**

# ATF/HBU/LEU+ Lead Fuel Assembly Programs in US

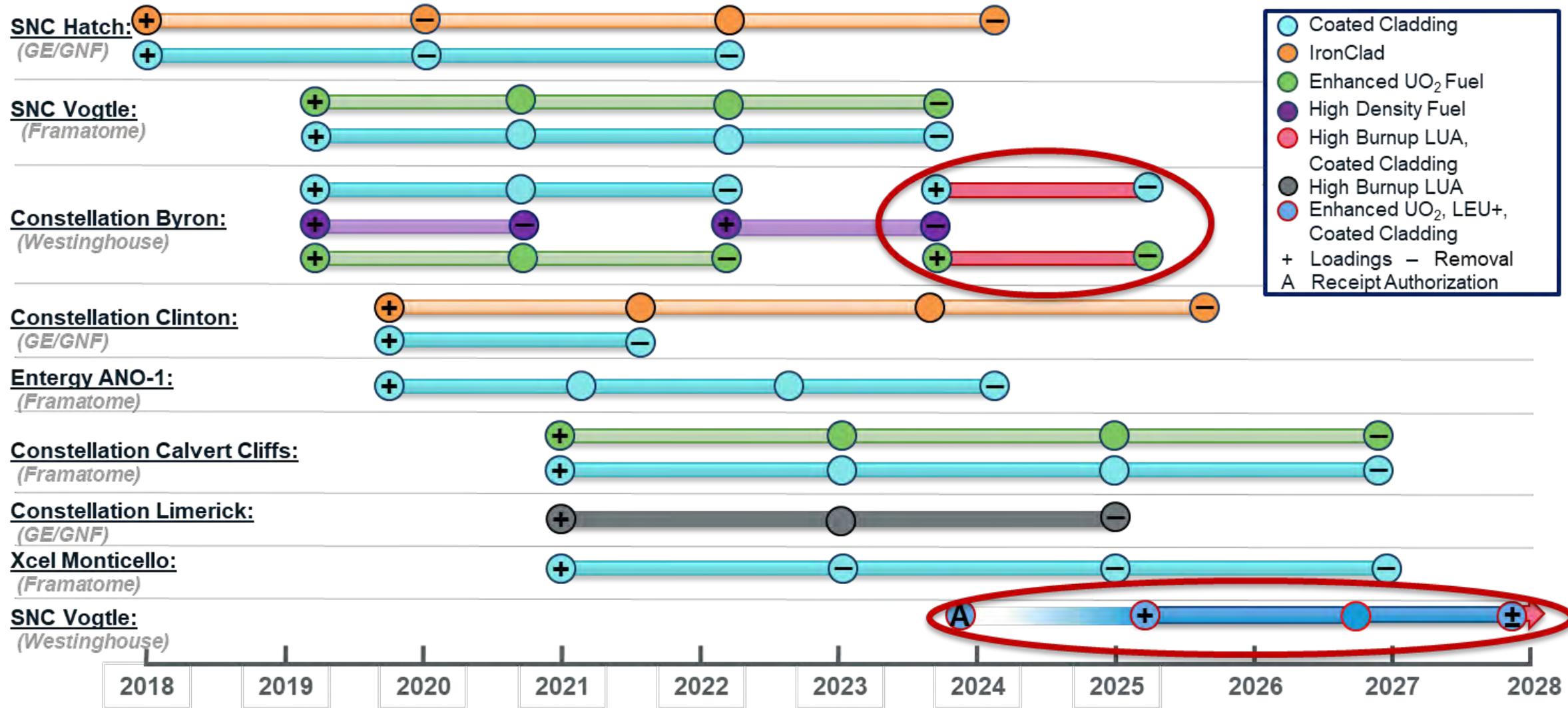
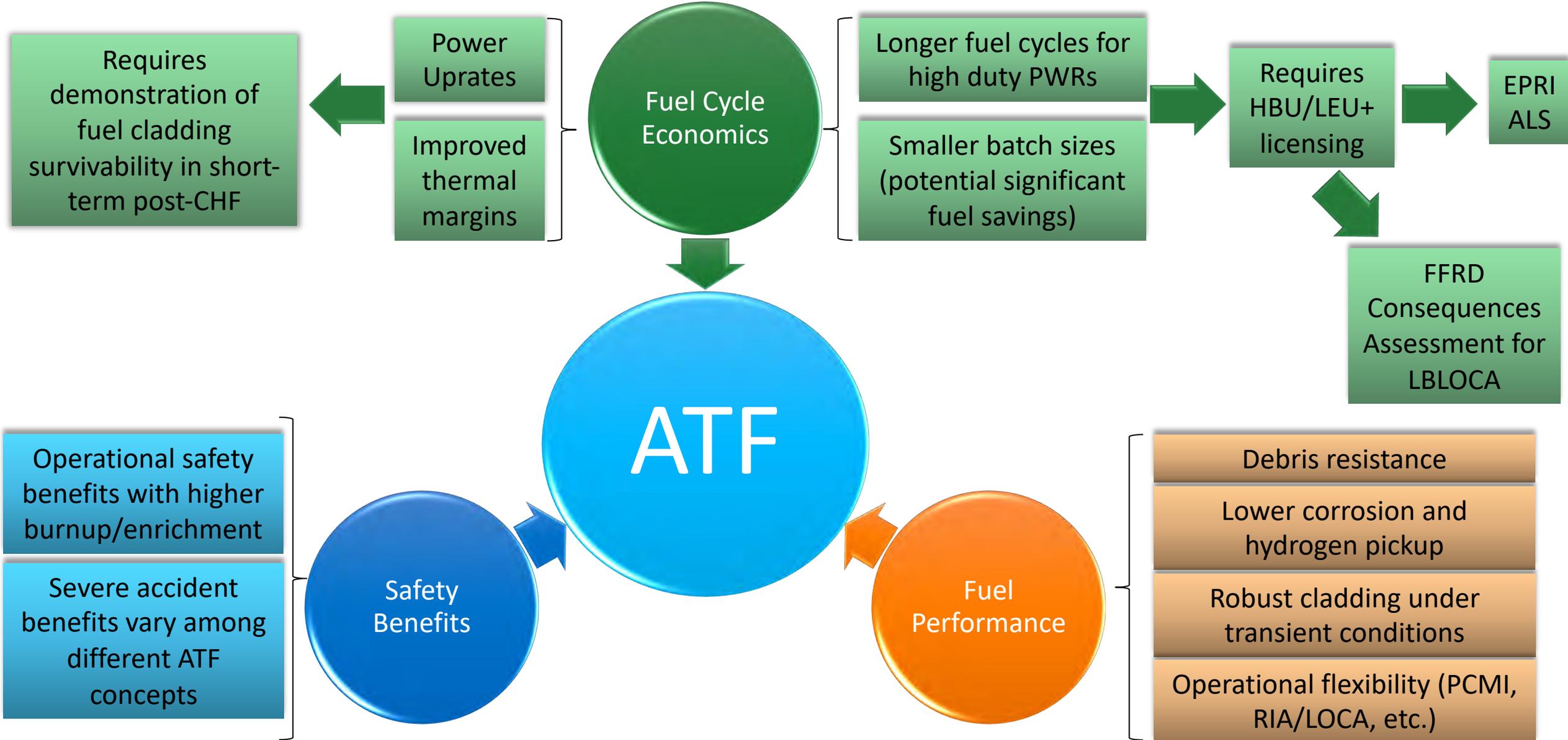


Chart courtesy of NEI

# U.S. ATF Program Overview and Activity in the Industry

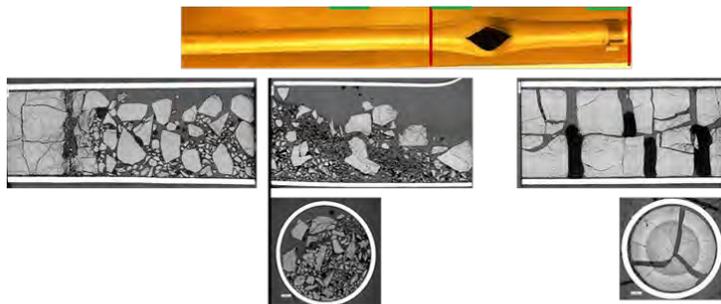


# Fuel Cycle Economics – HBU/LEU+

Goal: Develop technical and licensing bases for resolving FFRD issue and open the path for industry to extend burnup up to 75 GWd/MTU

## Alternative Licensing Strategy

- Approach to address FFRD in high burnup PWR fuel
  - Perform small break and intermediate break LOCA analysis to demonstrate no clad rupture and acceptable fuel relocation
  - Realistic treatment of large break LOCAs based on xLPR (Extremely Low Probability of Rupture) calculated event propagation and T/S required plant shutdown for Leak Before Break (LBB) qualified piping



## FFRD Consequences Assessments for LBLOCA

- Fuel suppliers are developing methods to assess FFRD consequences
- EPRI is performing analysis and testing to investigate the FFRD consequences and develop technical basis data
  - Fuel Fragment Fragility
  - Fragment Terminal Velocity in Steam
  - Mobility in water (Containment Impact)
  - Fuel Release
  - Fragment Dispersal in RCS/Containment
- Industry wide coordination of FFRD issue through CRAFT

**Note:** EPRI's NFIR Program performed a series of separate effect tests to understand the fuel fragmentation phenomenon and developed a threshold – detailed presentation later this morning

# Fuel Cycle Economics - Power Upgrades and Thermal Margin Improvements

- Relaxed TaT T/H criteria has significant economic benefits to all plants
  - IRA Production Tax Credit drives utilities considering power upgrades
    - Many plants are DNB/MCPR limited
    - Credit TaT for select transients
    - Establish cladding performance limits
  - Coated cladding may provide additional margin for cladding survivability at post-CHF condition
- CRAFT TaT Technical Experts Group (TEG)
  - Develop a material testing plan including identification of testing facility, defining the test protocol, selection of materials, and determination of the funding source
  - Fully vetted research plan by all industry experts and stakeholders through CRAFT

CRAFT - Collaborative Research on Advanced Fuel Technologies, TaT – Time-at-Temperature, IRA – Inflation Reduction Act

# ATF Fuel Performance Assessment and Implementation

Goal: Demonstrate no harm to plant operation and assess fuel reliability margins – focus is full reload implementation, not product development

## Coating Behavior Assessment

BWR ATF Performance in Transient Water Chemistry

PWR Cr-51 Assessment due to Cr-coating Dissolution

Irradiated Coated PWR Cladding - Corrosion and Hydrogen Pickup Measurements

Atomistic Modeling of Coating Behavior

## NDE Technology Development

F-SECT Qualification for Coating Thickness Measurements

F-SECT Poolside Demo for Coating Thickness Measurements

## Fretting Wear Assessment

Fretting Wear Testing and Modeling of ATF Concepts - Qualitative Margin Assessment for Debris-Induced Failure Mitigation

## HBU Fuel Assessment

BWR/PWR HBU Fuel Characterization - Thermo-Mechanical Model Improvements

HBU Fuel PCI Risk Assessment

# Safety Benefits

## HBU Safety Benefits

- Fuel cycle
  - Reducing reload batch sizes
  - Reducing fuel handling accident risk
  - Producing less high-level rad waste
  - Reduced dose for the whole fuel cycle
- Back-end impacts
  - Decay heat
  - Criticality
  - Radiation Dose

## ATF Severe Accident Safety Benefits

- Safety benefits vary depending on the ATF cladding concepts and accident scenarios
  - Each concept provides additional coping time
- Plan to reassess safety benefits
  - Upgrades to Modular Accident Analysis Program (MAAP) code for ATF cladding, higher burnup, and increased enrichment with new models and material properties
  - Participating in OECD-NEA QUENCH-ATF Project and severe accident code benchmark exercise
- Accident Source Term impacts
  - NOT driven by fuel burnup increase

# Timeline for ATF/HBU/LEU+ - Pilot for PWRs

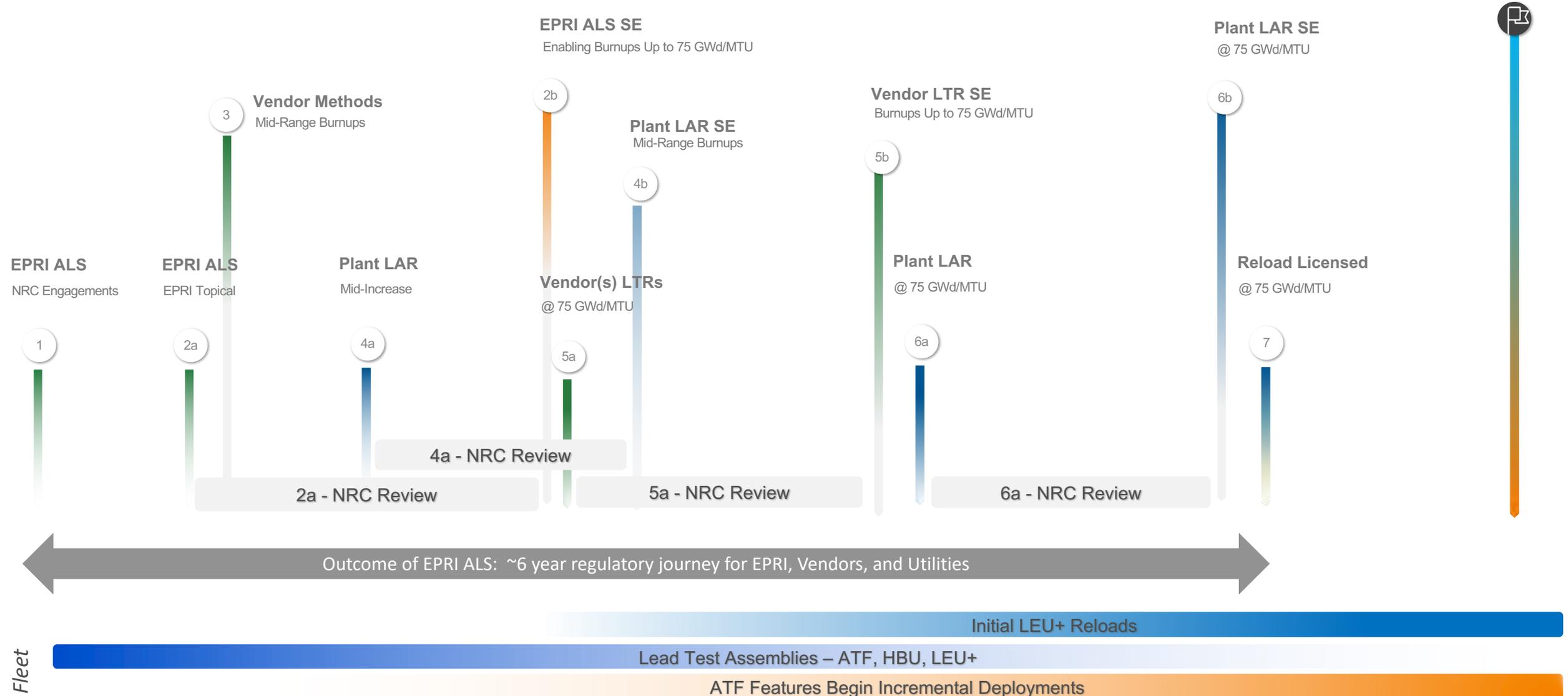
Chart courtesy of SNOC

Max Burnup: 62 GWd/MTU

Max Burnup: Mid-Range Increase

75 GWd/MTU

Burnup Limit at 75 GWd/MTU  
Late 2020s – Achieve Aspirations



A blue-tinted photograph of four people standing in a row. From left to right: a woman with curly hair and glasses wearing a white lab coat with 'EPRI' on the pocket; a man with glasses wearing a white lab coat with 'EPRI' on the pocket; a woman wearing a white hard hat and a dark polo shirt with 'EPRI' on the chest; and a man with glasses and a beard wearing a light blue button-down shirt. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# xLPR Methodology

## Probabilistic Fracture Mechanics for PWR Piping

Craig Harrington and Nate Glunt  
EPRI Materials Reliability Program (MRP)

Markus Burkardt and Gideon Schmidt  
Dominion Engineering, Inc. (DEI)

U.S. NRC ACRS Fuel, Materials, and Structures Subcommittee Meeting  
May 18, 2023



# Outline

- xLPR Overview
- xLPR Work Scope
- Summary of xLPR Analysis Cases
- Key Results
  - LOCA frequency compared to NUREG-1829
  - Time between detectable leakage and rupture
  - Investigating limiting cases
- Conclusions



# List of Acronyms

ALS	Alternative licensing strategy	NRC TLR	US Nuclear Regulatory Commission Technical Letter Report
CE	Combustion Engineering	PWR	Pressurized water reactor
CL	Cold leg	PWSCC	Primary water stress corrosion cracking
DMW	Dissimilar metal weld	PZR	Pressurizer
DN	Diametre nominal	RCP	Reactor coolant pump
FFRD	Fuel fragmentation, relocation and dispersal	RCS	Reactor coolant system
HL	Hot leg	RVIN	Reactor vessel inlet nozzle
ISI	In-service inspection	RVON	Reactor vessel outlet nozzle
LBB	Leak-before-break	SGIN	Steam generator inlet nozzle
LRD	Leak rate detection	SGON	Steam generator outlet nozzle
LOCA	Loss-of-coolant accident	WRS	Weld residual stress
MDM	Materials Degradation Matrix	xLPR	Extremely Low Probability of Rupture
NPS	Nominal pipe size		



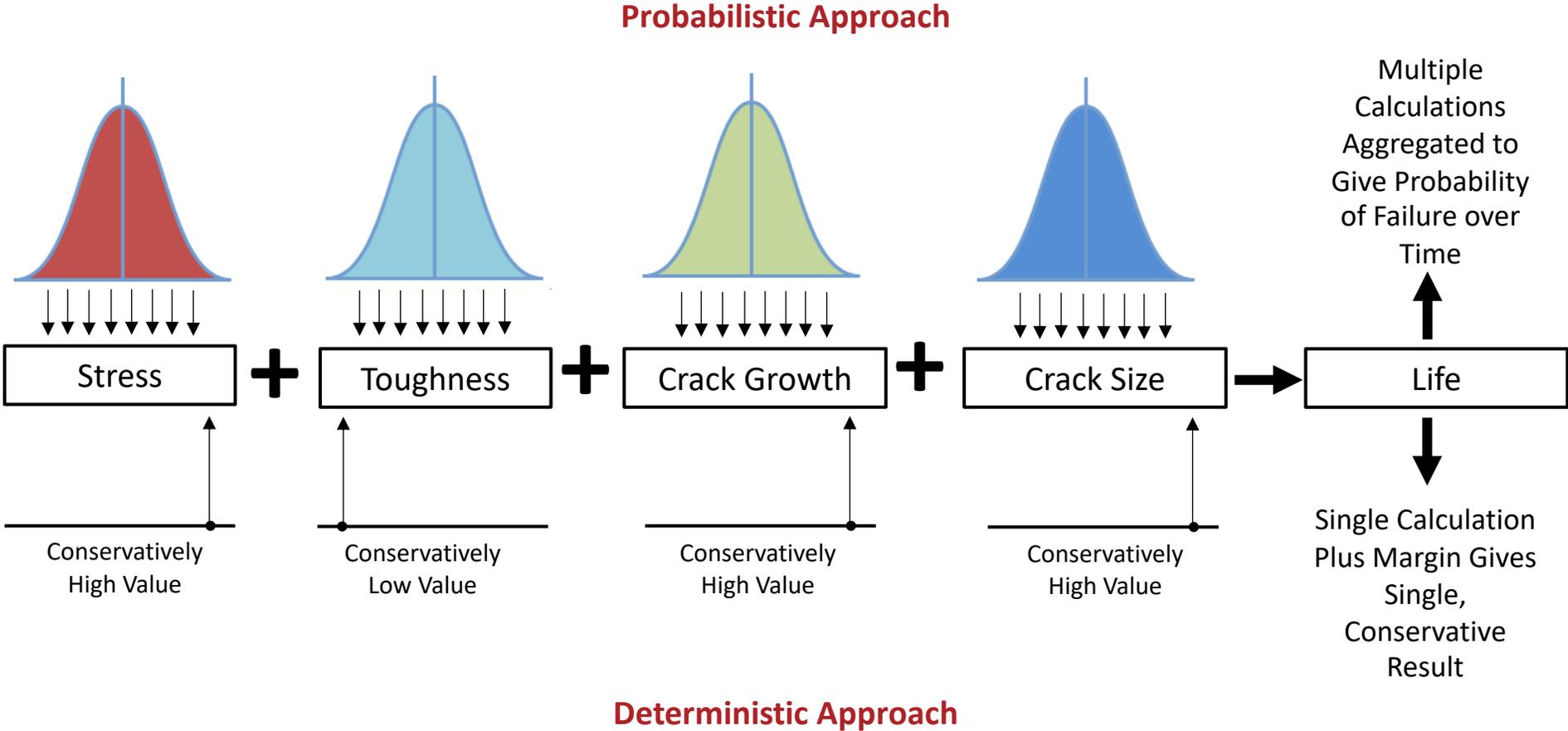
# xLPR Overview

# xLPR Probabilistic Fracture Mechanics Code

- xLPR is a state-of-the-art **probabilistic fracture mechanics code** jointly developed by the NRC's Office of Nuclear Regulatory Research and the Electric Power Research Institute (EPRI)
- Provides new quantitative capabilities to analyze the risks (e.g., leakage or rupture) associated with nuclear power plant piping systems subject to active degradation mechanisms
- Core capabilities include modeling fatigue, stress corrosion cracking, inservice inspection, chemical and mechanical mitigation, leak rates, and seismic effects



# PROBABILISTIC VS. DETERMINISTIC





# xLPR Work Scope

# xLPR Work Scope & the Fuels Alternative Licensing Strategy

- Use xLPR probabilistic fracture mechanics analyses to provide validation of the expert elicitation-based LOCA frequency estimates within NUREG-1829, Vol. 1, “Estimating Loss-of-Coolant Accident (LOCA) Frequencies Through the Elicitation Process”
- Gain insights from xLPR analyses about the time between detectable leakage and rupture
- Key xLPR outputs investigated through this report, which are inputs for the fuels alternative licensing strategy (ALS) for fuel fragmentation, relocation, and dispersal (FFRD), are:
  - Probability of LOCAs (e.g., pipe ruptures) as a function of line size
  - Probability that leakage as a precursor to a LOCA will be detected in sufficient time to allow for reactor shutdown and reduce decay heat levels before a reactor coolant system (RCS) piping rupture occurs

# Line Size Considerations

- NUREG-1829 gives estimates of LOCA frequencies based on expert elicitation (Table 1)

**Table 1 Total BWR and PWR LOCA Frequencies  
(After Overconfidence Adjustment using Error-Factor Scheme)**

Plant Type	LOCA Size (gpm)	Eff. Break Size (inch)	Current-day Estimate (per cal. yr) (25 yr fleet average operation)				End-of-Plant-License Estimate (per cal. yr) (40 yr fleet average operation)			
			5 <sup>th</sup> Per.	Median	Mean	95 <sup>th</sup> Per.	5 <sup>th</sup> Per.	Median	Mean	95 <sup>th</sup> Per.
			BWR	>100	1/2	3.3E-05	3.0E-04	6.5E-04	2.3E-03	2.8E-05
	>1,500	1 7/8	3.0E-06	5.0E-05	1.3E-04	4.8E-04	2.5E-06	4.5E-05	1.2E-04	4.8E-04
	>5,000	3 1/4	6.0E-07	9.7E-06	2.9E-05	1.1E-04	5.4E-07	9.8E-06	3.2E-05	1.3E-04
	>25K	7	8.6E-08	2.2E-06	7.3E-06	2.9E-05	7.8E-08	2.3E-06	9.4E-06	3.7E-05
	>100K	18	7.7E-09	2.9E-07	1.5E-06	5.9E-06	6.8E-09	3.1E-07	2.1E-06	7.9E-06
	>500K	41	6.3E-12	2.9E-10	6.3E-09	1.8E-08	7.5E-12	4.0E-10	1.0E-08	2.8E-08
PWR	>100	1/2	6.9E-04	3.9E-03	7.3E-03	2.3E-02	4.0E-04	2.6E-03	5.2E-03	1.8E-02
	>1,500	1 5/8	7.6E-06	1.4E-04	6.4E-04	2.4E-03	8.3E-06	1.6E-04	7.8E-04	2.9E-03
	>5,000	3	2.1E-07	3.4E-06	1.6E-05	6.1E-05	4.8E-07	7.6E-06	3.6E-05	1.4E-04
	>25K	7	1.4E-08	3.1E-07	1.6E-06	6.1E-06	2.8E-08	6.6E-07	3.6E-06	1.4E-05
	>100K	14	4.1E-10	1.2E-08	2.0E-07	5.8E-07	1.0E-09	2.8E-08	4.8E-07	1.4E-06
	>500K	31	3.5E-11	1.2E-09	2.9E-08	8.1E-08	8.7E-11	2.9E-09	7.5E-08	2.1E-07

- The expert elicitation considered LOCA-sensitive piping systems and associated degradation mechanisms (Table 3.5)

**Table 3.5 PWR LOCA-Sensitive Piping Systems**

System	Piping Matls.	Piping Size (in)	Safe End Matls.	Welds	Sig. Degrad. Mechs.	Sig. Loads.	Mitigation/Maint.
RCP: Hot Leg	304 SS, 316 SS, C-SS, SSC-CS CS - SW	30 - 44	A600, 304 SS, 316 SS, CS	A82 304 SS, 316 SS, CS	TF, SCC, MA, FDR, UA	P, S, T, RS, DW, O, SUP	ISI w TSL, REM
RCP: Cold Leg/Crossover Leg	304 SS, 316 SS, C-SS, SSC-CS, CS - SW	22 - 34	A600, 304 SS, 316 SS, CS	A82 304 SS, 316 SS, CS	TF, SCC, MA, FDR, UA	P, S, T, RS, DW, O, SUP	ISI w TSL, REM
Surge line	304 SS, 316 SS, C-SS	10 - 14	A600, 304 SS, 316 SS,	A82 304 SS, 316 SS	TF, SCC, MA, FDR, UA	P, S, T, RS, DW, O, TFL, TS	TSMIT, ISI w TSL, REM
SIS: ACCUM	304 SS, 316 SS, C-SS	10 - 12	A600, 304 SS, 316 SS,	A82 304 SS, 316 SS	TF, SCC, MA, FS, FDR, UA (FAC)	P, S, T, RS, DW, O	ISI w TSL, REM
SIS: DVI	304 SS, 316 SS	2 - 6	A600, 304 SS, 316 SS,	A82 304 SS, 316 SS	TF, SCC, MA, FS, FDR, UA (FAC)	P, S, T, RS, DW, O	ISI w TSL, REM
Drain line	304 SS, 316 SS, CS	< 2"			MF, TF, GC, LC, FDR, UA	P, S, T, RS, DW, O, V, TFL	ISI w TSL, REM
CVCS	304 SS, 316 SS	2 - 8	A600 (B&W and	A82	SCC, TF, MF, FDR, UA	P, S, T, RS, DW, O, V	ISI w TSL, REM

The goal of the current study is to analyze piping welds > NPS 14 (> DN 350) in support of alternative licensing strategy (ALS) for FFRD

# Investigation of Other Degradation Mechanisms

- NUREG-1829 considers additional material degradation mechanisms not included in xLPR
  - A review of the Materials Degradation Matrix (MDM) was performed. Mechanisms relevant to 300 series stainless steels and Alloy 82/182 welds in PWR primary system piping are rigorously identified
  - Identified degradation mechanisms are either evaluated herein, addressed by other industry guidance, or are not anticipated (per the MDM) to be degradation modes of concern
- Consequently, results from xLPR considering primary water stress corrosion cracking (PWSCC) and fatigue provide valuable information regarding conservatism or non-conservatism of the NUREG-1829 LOCA frequencies



# Summary of xLPR Analysis Cases

# Analysis Cases

- xLPR analysis cases were developed applying PWSCC and/or fatigue (*driven by plant transients and not local thermal fluctuations or vibration*) as the material degradation mechanisms
- Analysis cases either modeled flaws as present at the start of the simulation or used initiation models to calculate the time to flaw initiation
  - All flaws at initiation were modeled as flaws of engineering scale.
- Sensitivity studies were performed to determine the impact of changes to analysis inputs
  - Sensitivity studies modeled alternate inputs for parameters such as geometry, loading, weld residual stress profiles, or initial flaw sizes

# Output Quantities of Interest

- Results Directly Output by xLPR
  - Probability of rupture
    - Used to calculate rupture frequencies
    - Option of conservatively not crediting in-service inspection (ISI) or leak rate detection (LRD)
    - Results utilizing initial flaw of engineering scale are conditional on crack initiation
  - Probability of crack initiation
  - Leak rate
- Post-Processed Results
  - Time between 1 gpm detectable leakage and rupture (“lapse time”)
  - $P(\text{Rupture} | \text{Initiation}) \approx P(\text{Rupture} | \text{Initial Flaw}) \times P(\text{Initiation})$
  - Average 80-year rupture (LOCA) frequency =  $P(\text{Rupture}) / 80 \text{ yrs}$

# Previous xLPR Studies

- xLPR analyses have recently been published by the US NRC in the context of LBB analyses for A82/182 dissimilar metal butt welds in PWR piping systems:
  - **TLR-RES/DE/REB-2021-09 (ML21217A088)**
    - Referred to herein as “xLPR piping system analysis”
    - Documented xLPR analysis of representative reactor vessel outlet and inlet nozzle welds in a Westinghouse four-loop PWR
    - Includes extensive set of sensitivity studies
  - **TLR-RES/DE/REB-2021-14 R1 (ML22088A006)**
    - Referred to herein as “xLPR generalization study”
    - Documented xLPR analysis of other piping systems containing Alloy 82/182 dissimilar metal piping butt welds which had received prior LBB approvals from the NRC staff
    - Includes reduced set of sensitivity studies per analyzed component, as informed by “xLPR piping system analysis”

**The results of these analyses are used where possible and supplemented with additional xLPR analysis cases as needed**

# Summary of Base Cases

Study	Piping System Analysis		Generalization Study			
<b>NUREG-1829 Line/System</b>	Reactor Coolant Piping: Hot Leg	Reactor Coolant Piping: Cold Leg	Reactor Coolant Piping: Hot Leg	Reactor Coolant Piping: Cold Leg	Surge Line	Safety Injection (Accumulator)
<b>Weld Analyzed</b>	RVON	RVIN	RVON, SGIN	RCP Inlet/Outlet, SGON	PZR Surge, CE Hot Leg Branch Line DMW	CE Cold Leg Branch Line DMW
<b>Fatigue Crack Growth</b>	No	No	No	No	No	No
<b>PWSCC Crack Growth</b>	Yes	Yes	Yes	Yes	Yes	Yes
<b>Initial Flaws</b>	No	No	No	No	No	No
<b>Axial/Circ Flaws</b>	Circ	Circ	Both	Both	Both	Both
<b>Seismic Occurrences</b>	No	No	No (4-loop RVON); Yes (others)	Yes	Yes	Yes
<b>Mitigation</b>	No	No	No (RVON); Yes (SGIN)	No	No	No
<b>ISI/LRD</b>	Optional in outputs	Optional in outputs	Optional in outputs	Optional in outputs	Optional in outputs	Optional in outputs

Focus of ALS

# Summary of Sensitivity Studies

Legend	
	Sensitivity study included

Study	Piping System Analysis		Generalization Study			
	Reactor Coolant Piping: Hot Leg	Reactor Coolant Piping: Cold Leg	Reactor Coolant Piping: Hot Leg	Reactor Coolant Piping: Cold Leg	Surge Line	Safety Injection (Accumulator)
<b>NUREG-1829 Line/System</b>						
<b>Weld Analyzed</b>	RVON	RVIN	RVON, SGIN	RCP Inlet/Outlet, SGON	PZR Surge, CE HL Branch Line DMW	CE CL Branch Line DMW
<b>Initiation</b>						
<b>WRS</b>						
<b>Earthquake</b>						
<b>Normal Operating Thermal Loads</b>						
<b>LRD/ISI</b>						
<b>Mitigation</b>						
<b>Fatigue</b>						
<b>Initial Flaw Size</b>						
<b>Geometry</b>						
<b>Other</b>	axial cracks, hydrogen, temperature					

Focus of ALS



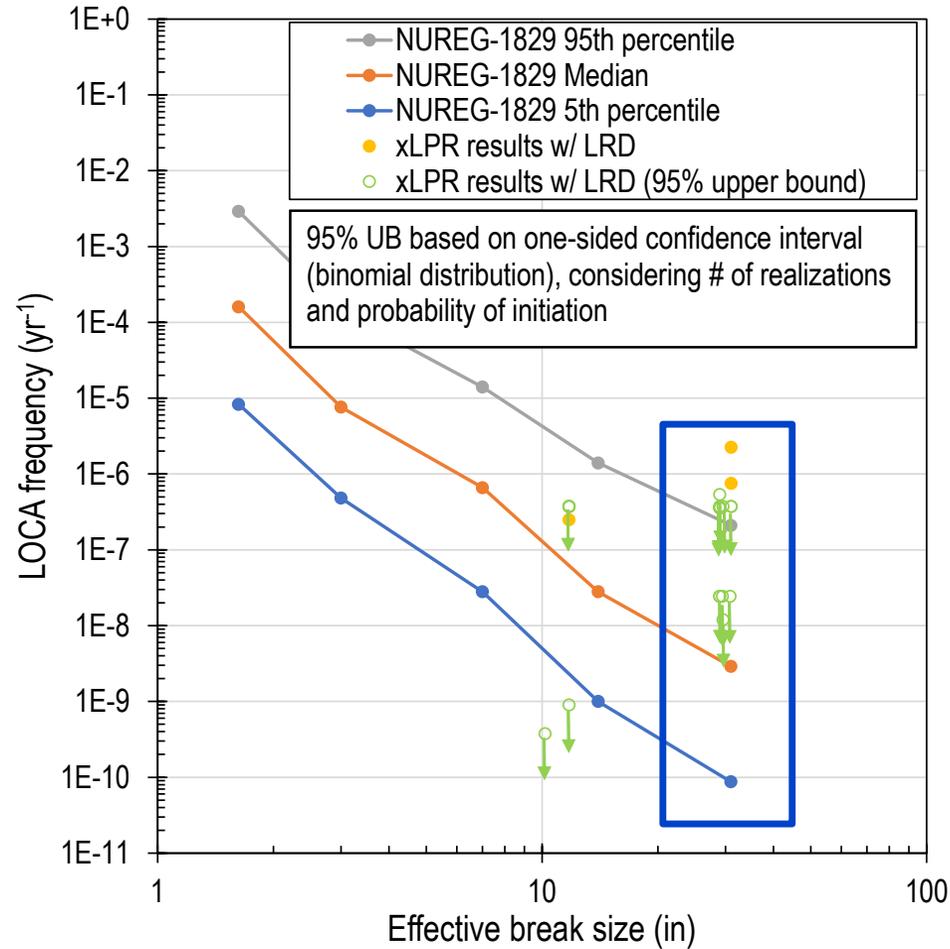
# LOCA Frequency Compared to NUREG-1829

# LOCA Frequency Compared to NUREG-1829 Table 1

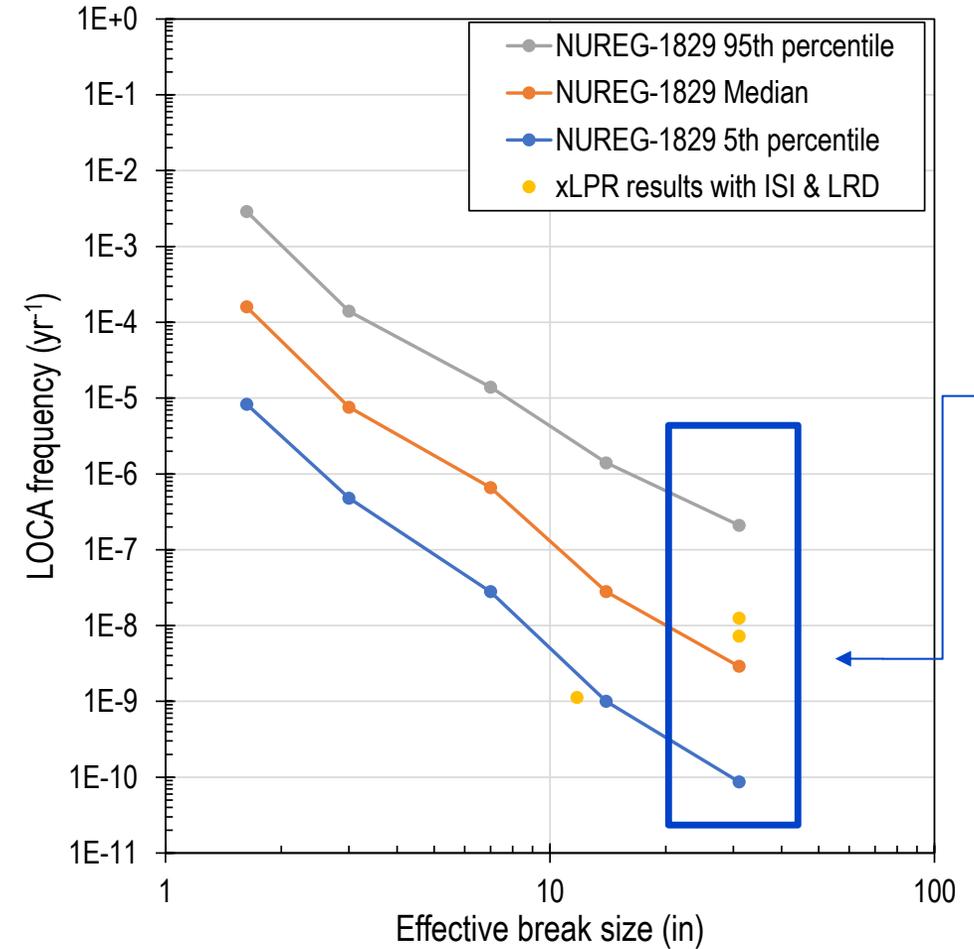
- NUREG-1829 LOCA frequencies used for comparison are:
  - Based on expert elicitation
  - From Table 1
    - Median, 5<sup>th</sup> percentile, and 95<sup>th</sup> percentile
    - Total PWR LOCA frequencies after overconfidence adjustment using error-factor scheme
    - 40 yr fleet average values
    - Consider typical ISI with LRD resolution as required by tech spec limits
  - Results are presented on a per plant basis, for each distinct LOCA category
  - Considers piping and non-piping passive system contributions

# LOCA Frequency Compared to NUREG-1829 Table 1

*Crediting LRD, Without Crediting ISI*



*Crediting LRD and ISI*



Focus of ALS

**When considering ISI and LRD, LOCA frequencies estimated from xLPR are on a similar order of magnitude as median NUREG-1829 LOCA frequency estimates**

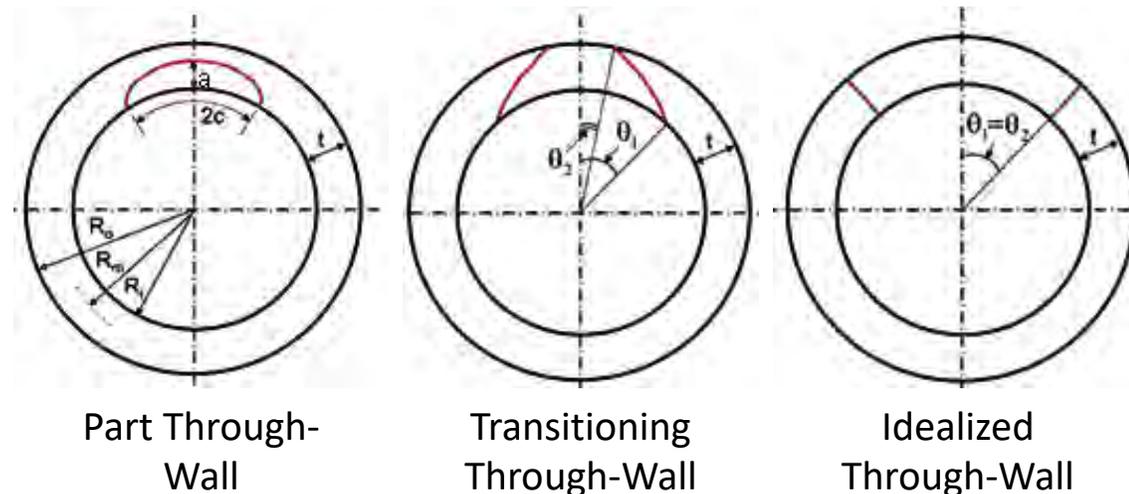
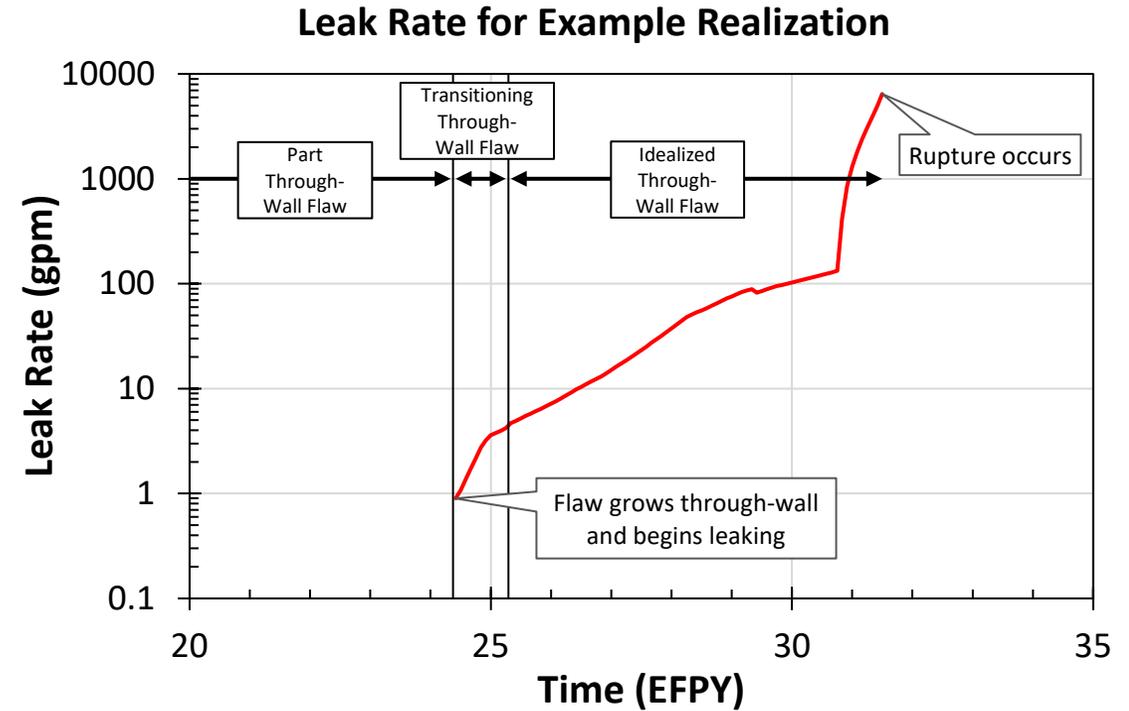


# Time Between Detectable Leakage and Rupture

# Time from Detectable Leakage to Rupture

For a Single xLPR Analysis Case Realization

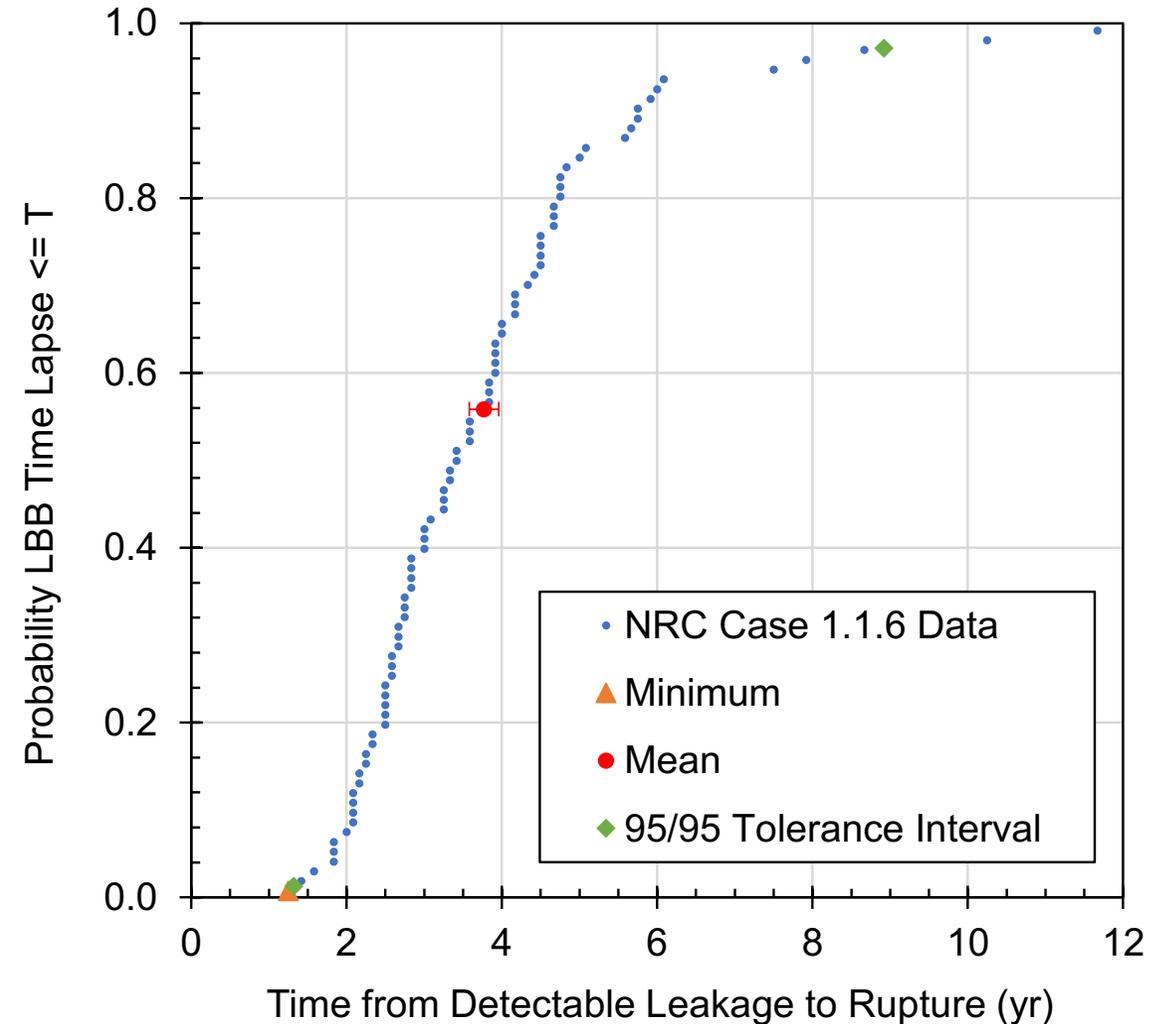
- Results shown depict example leak rate time history for one realization modeled in xLPR
  - Component modeled: Unmitigated Alloy 82/182 reactor vessel outlet nozzle dissimilar metal weld
  - Key modeling options selected:
    - Initial flaw model (i.e., initiation at time = 0)
    - PWSCC growth only
    - One circumferential crack
    - No inservice inspection, leak rate detection, mitigation, or seismic effects



# Distributions of Time from Detectable Leakage to Rupture

*For a Single xLPR Analysis Case*

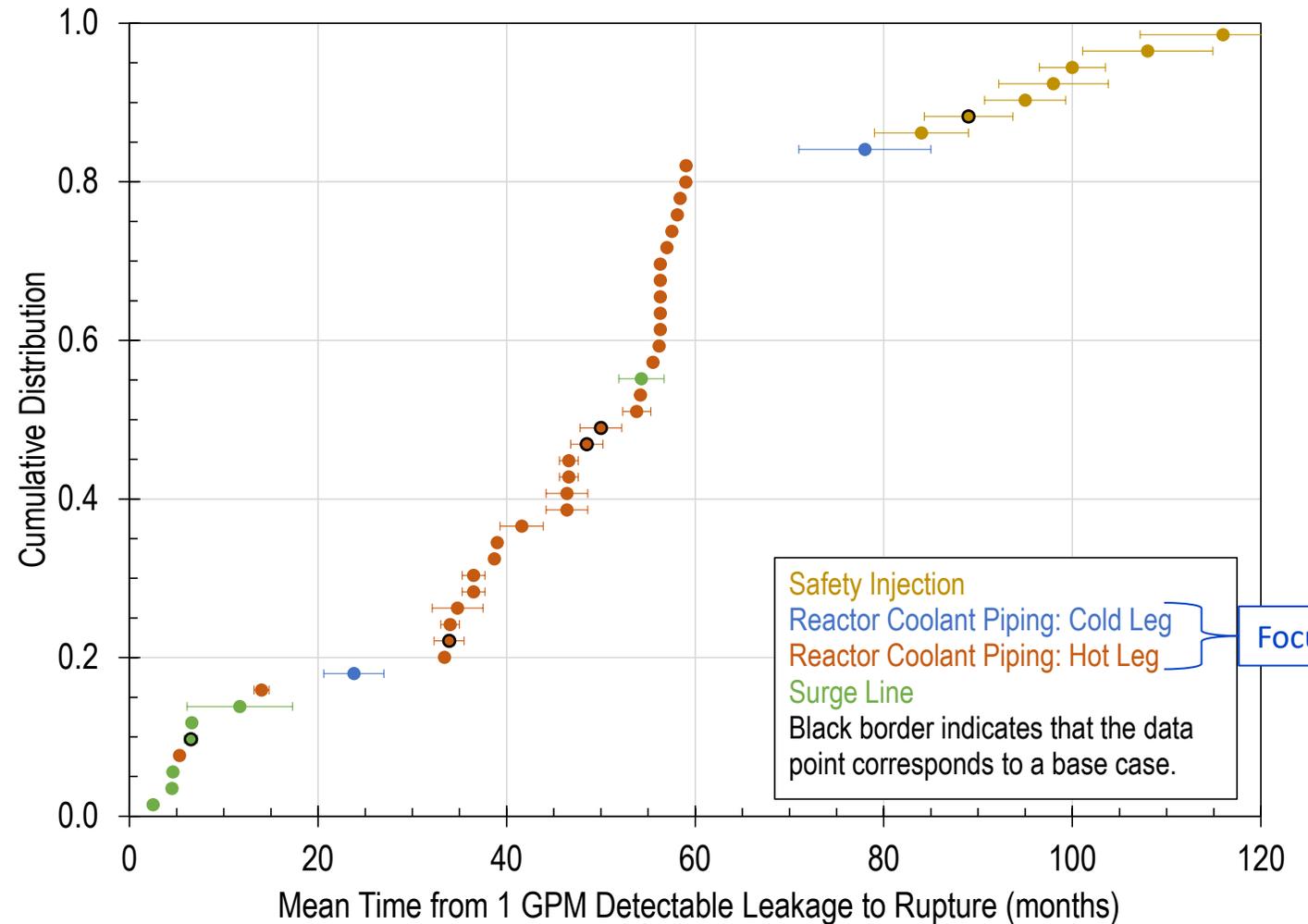
- Results for one xLPR analysis case produce a distribution of lapse times
- Each data point corresponds to one realization which resulted in rupture (without crediting ISI or LRD)
  - Note that lapse time results greater than 12 years are truncated in NRC TLRs
- Also shown:
  - Minimum
  - 95/95 tolerance interval (lognormal)
  - Mean
  - Standard error (error bars on mean)



# Mean Time from Detectable Leakage to Rupture

For all xLPR Analysis Cases

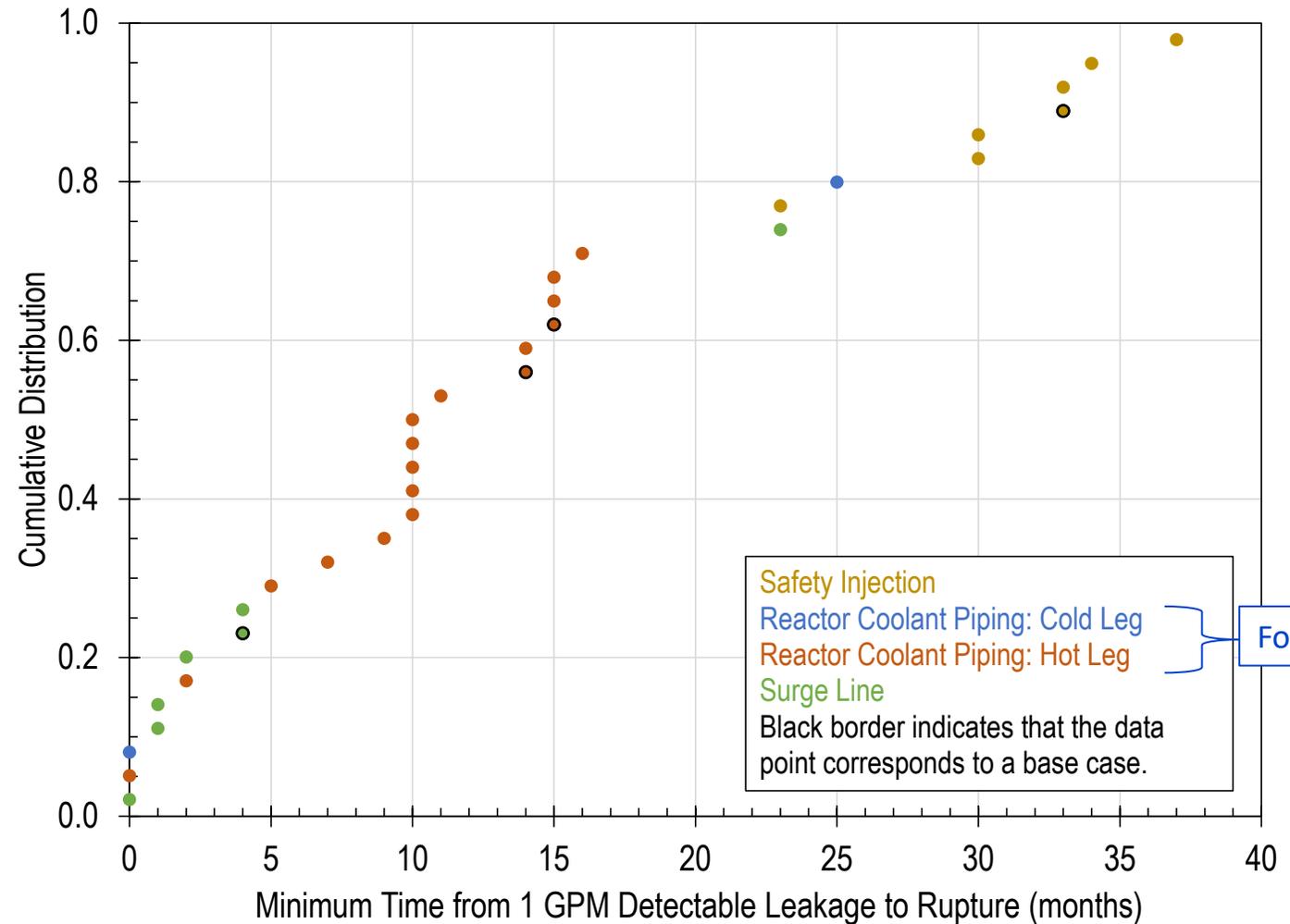
- Mean times from detectable leakage to rupture are reviewed for additional context
  - Shown with error bars equal to standard error
  - Times from detectable leakage to rupture listed as N/A in the NRC TLRs are not shown



# Minimum Time from Detectable Leakage to Rupture

For all xLPR Analysis Cases

- Minimum times from detectable leakage to rupture are reviewed as a screening exercise
- Cases with minimum time from detectable leakage to rupture under 3 months are investigated in further detail
  - These cases
    - Considered unmitigated welds subject to PWSCC growth at hot leg or pressurizer temperatures or included modeling not representative of plant conditions and operations
    - Are all sensitivity studies





# Investigating Limiting Cases

# Time Between Detectable Leakage and Rupture

## *Summary of Investigation of Limiting Sensitivity Studies*

- Performed further investigation for limiting cases exhibiting either:
  - Minimum time between detectable leakage and rupture < 3 months
  - Nonzero occurrence of rupture with LRD
- Some of these limiting cases were then re-run with:
  - Refined time-stepping
  - Updated input model parameters
- After dispositioning, for cases relevant to the ALS, the minimum time from detectable leakage to rupture is:
  - 14 months for the most limiting of the base cases evaluated
  - 0.8 months for the most limiting of the sensitivity studies evaluated

# Time Between Detectable Leakage and Rupture

*Lower Bound Times Using 95/95 Tolerance Interval*

- For the cases with limiting minimum times, the 95/95 tolerance interval was computed using a lognormal distribution
  - A 95/95 tolerance interval is defined such that “there is a 95% probability that the constructed limits contain 95% of the population of interest for the surveillance interval selected”
- **The 95/95 lower bound of the most limiting sensitivity study representative of the US PWR fleet is 3.8 months**
- The sensitivity studies were
  - Defined to inform understanding of the base case results by investigating inputs known to have influence on xLPR results
  - Less constrained by maintaining fidelity to realistic plant conditions



# Conclusions

# Conclusions

- When crediting ISI and LRD, occurrence of rupture results are on a similar order of magnitude as NUREG-1829 LOCA frequency estimates
  - The only nonzero results were for cases including modeling not representative of plant conditions and operations
  - For cases with zero ruptures w/ LRD, a 95% upper bound based on a one-sided confidence interval is considered for comparison
- For all base cases and most sensitivity studies considered, the minimum observed times from 1 gpm (3.8 lpm) detectable leakage to rupture exceeded three months
  - The 95/95 tolerance intervals show that for the most limiting sensitivity study representative of the US PWR fleet, the lower bound is 3.8 months

A blue-tinted photograph of four people, two men and two women, standing in a row. They are dressed in professional attire, including lab coats and a hard hat. The text 'Together...Shaping the Future of Energy®' is overlaid in white on the image.

**Together...Shaping the Future of Energy®**

# Alternative Licensing Strategy (ALS)

## LOCA induced Fuel Fragmentation, Relocation and Dispersal Topical Report

Fred Smith  
Sr. Technical Executive, EPRI

May 18, 2023

U.S. NRC ACRS Fuels, Materials, and Structures Subcommittee Meeting  
Bethesda, MD



# ALS – Deterministic and Risk Informed Approach

- Obtain NRC approval of generic method to address PWR LOCA induced FFRD in an expeditious manner
  - Avoid reliance on additional LOCA testing for FFRD
  - Limit licensing complexity and risk
    - Use previously approved methods and licensing strategy to the extent possible
    - Update as needed to address high burnup phenomena
  - Minimize the plant specific implementation activities
    - Confirm applicability requirements apply to specific plant

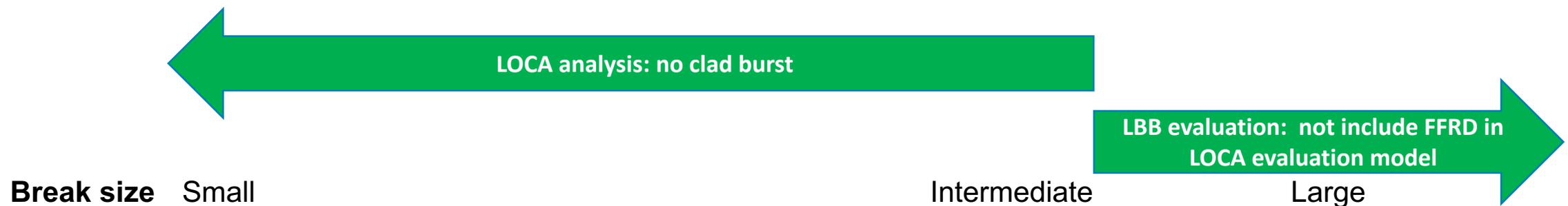
# ALS Approach

- **Approach to address FFRD in high burnup PWR fuel:**
  - Small and intermediate break LOCA analysis to show acceptable fuel cooling and no clad rupture
  - Large break LOCA acceptability based on realistic xLPR calculated event propagation
    - Leak Before Break (LBB) qualified piping
    - Ample time to detect precursor leakage prior to rupture
    - T/S required plant shutdown and significant reduction in decay heat
- **Rationale:**
  - Full LOCA analysis maintained to show ECCS performance meets 10 CFR 50.46
  - LBB to exclude FFRD from evaluation model, as already done for various local phenomena
  - External to RPV (jet impingement, asymmetric vessel loading, failure of ECCS cross-connect valve)
  - Internal to RPV (control rod scram, fuel mechanical loads)

# ALS Approach

## ■ Implementation:

- Apply xLPR analysis to coolant piping of reactor coolant system (RCS)
  - LBB already approved for large-diameter piping
  - Demonstrate time available from reaching detectable leak rate until potential pipe rupture is sufficient to justify crediting operator detection and reaching cold shutdown
    - LBLOCA will not induce FFRD in Mode 5
- Non-LBB piping analyzed with design bases LOCA methods
  - SBLOCA and IBLOCAs will not cause clad burst, thereby precluding fuel dispersal
- Utility license amendment requests (LARs) reference ALS Topical Report
  - Confirm the analysis range of applicability applies to the plant
  - Reduces repetitive NRC staff review effort



# LOCA Analysis Approach for SB-LOCA & IB-LOCA

- Develop analysis applicable to Westinghouse plants
  - Bounding PWR/ECCS models
    - Nuclear design envelope
    - Fuel rod design data
  - Include conservatisms to ensure plant-specific operation falls within analysis envelope
  - Address ECCS design differences for various class of plants
- Address high burnup fuel rod phenomena
  - Transient fission gas release
  - Pre-burst axial fuel relocation
  - Cladding and fuel materials intended for high burnup operation
- Execute cladding rupture calculation for high burnup fuel population
- Define analysis applicability for utility LAR submittals



# LBLOCA with LBB

# Leakage Technical Specifications

- Limiting Condition for Operation (LCO)
  - No Reactor Coolant Pressure Boundary leakage
  - Unidentified Leakage < 1 gpm

## Required Action:

**Mode 3 within 6 hours**

**Mode 5 within 36 hours**

- Periodic surveillance to verify LCO met
- Most appropriate operating domain for LB-LOCA induced FFRD analysis is Mode 5

### 3.4 REACTOR COOLANT SYSTEM (RCS)

#### 3.4.13 RCS Operational LEAKAGE

- LCO 3.4.13 RCS operational LEAKAGE shall be limited to:
- a. No pressure boundary LEAKAGE,
  - b. 1 gpm unidentified LEAKAGE,
  - c. 10 gpm identified LEAKAGE, and
  - d. 150 gallons per day primary to secondary LEAKAGE through any one steam generator (SG).

APPLICABILITY: MODES 1, 2, 3, and 4.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCS operational LEAKAGE not within limits for reasons other than pressure boundary LEAKAGE or primary to secondary LEAKAGE.	A.1 Reduce LEAKAGE to within limits.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	6 hours
<u>OR</u>	<u>AND</u>	
Pressure boundary LEAKAGE exists.	B.2 Be in MODE 5.	36 hours
<u>OR</u>		
Primary to secondary LEAKAGE not within limit.		

# LB-LOCA Evaluation

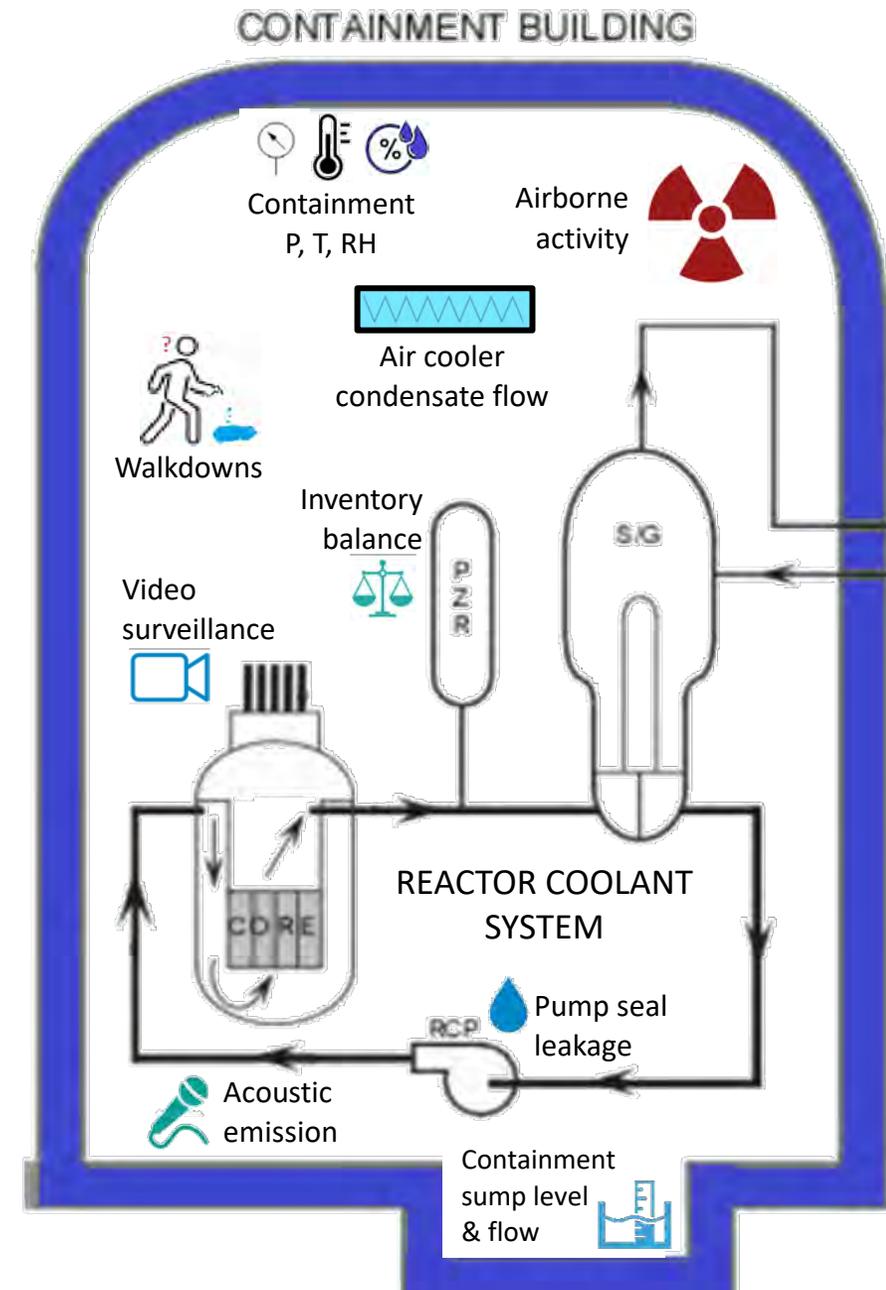
- All PWRs have LBB approved for RCS piping
  - xLPR analysis of main coolant piping demonstrates
    - 3.8 months (95/95 lower limit) between exceeding Technical Specification leakage limit and pipe rupture
  - There is no motive force to cause a pipe rupture in Mode 5
    - Even if a rupture could occur, fuel cladding burst would not occur
      - Negligible cladding heat up: decay heat will have dropped to 1/50<sup>th</sup> of full-power value
      - Core pressure reduced
      - No full system blowdown
  - Configuration is essentially the same as post LOCA long term cooling

# Defense in Depth Considerations for LB-LOCA

- For LBB evaluated piping systems
  - A substantial range of pipe crack sizes are stable for an extended period of time
  - Provides detectable leaks
  - The probability of piping rupture is extremely low ( $<10^{-6}$ )
- Defense in depth considerations for LBB analysis are embedded in fracture mechanics analysis process
  - Main coolant pipe rupture is not assumed as an additional defense in depth consideration
- xLPR addresses uncertainties using modern uncertainty propagation to provide upper/lower limit analysis results

# Defense in Depth Considerations

- Barriers to prevent LB-LOCA FFRD are:
  - Low frequency of LB-LOCA
  - Unidentified Leakage Technical Specification
  - Extended time between leakage detection and pipe rupture
- Defense in Depth Considerations to protect these barriers
  - Plant Operations performing T/S surveillance
    - Significant time margin before adverse consequences could develop
    - Highly qualified/trained operations staff
    - Highly proceduralized process
    - Independently review determination
    - Multiple independent indications (RG 1.45)
  - Rigorous treatment of uncertainties in xLPR ensure time to rupture is appropriately conservative

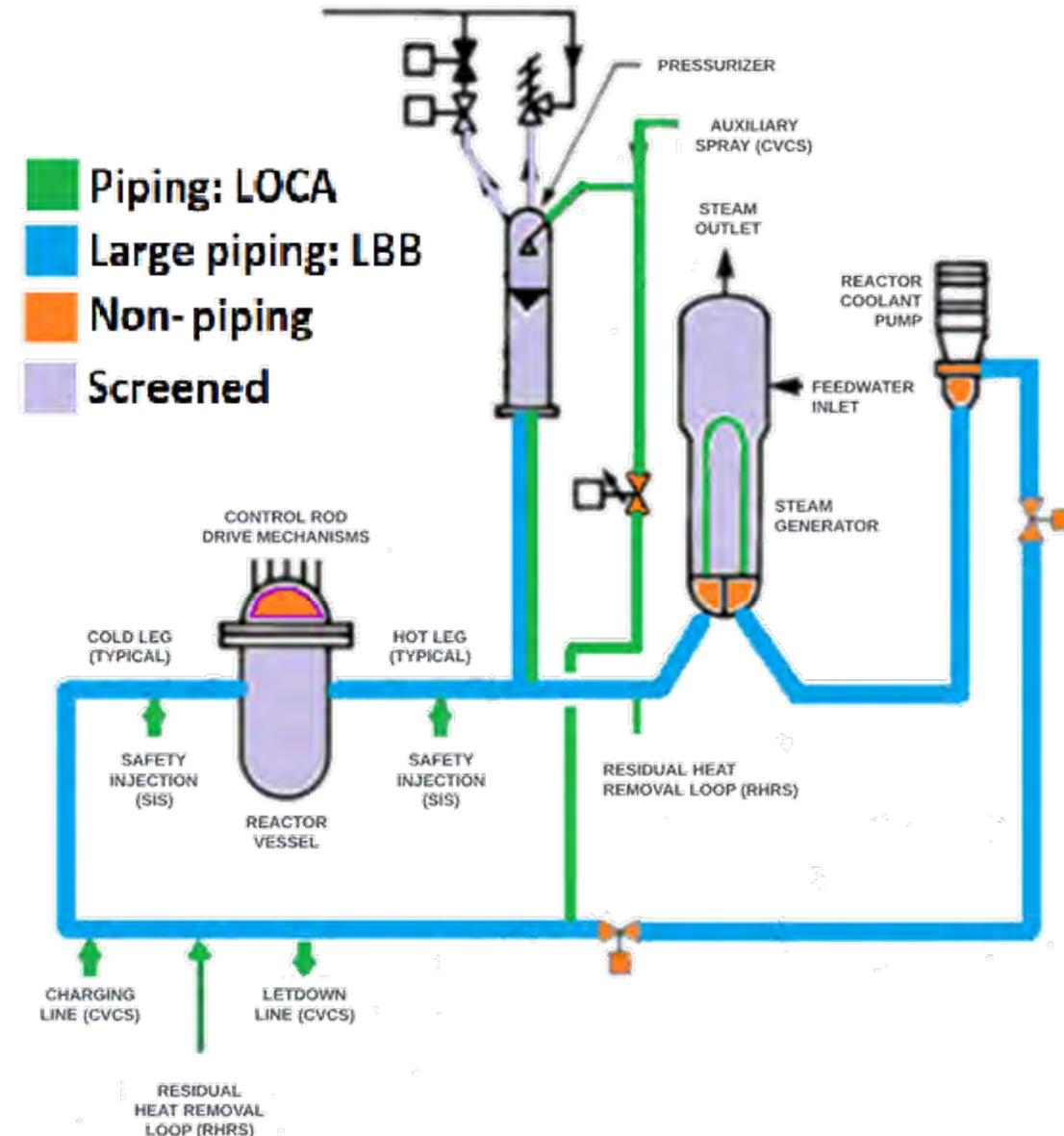




# Non-piping LOCA

# Evaluation of Non-piping LOCA

- Non-piping
  - Screened
    - Beyond design basis (e.g., RPV failure)
    - Bounded by LOCA with larger flow rate
  - Bolted
    - Failure mechanisms
    - Evaluation of LBB-type behavior
    - Margin to failure
  - Component bodies
    - ASME design limits allowable stress
    - Intervening flow resistance prevents flow rate high enough to cause clad burst
    - Supports/restraints make large opening implausible
  - Active component failures





# Other Related Information

# Sample of Various Engagements with NRC

- Alternative Licensing Approaches for Higher Burnup Fuel, July 2020, EPRI 3002018457 (Public)
- xLPR NRC Public Meeting Briefing June 14, 2022, ML22166A345
- ALS Presentation at NRC High Burnup Workshop August 24, 2022, ML22235A740
- ALS Pre-submittal meeting August 30, 2022, ML2241A133
- High Burnup Alternative Licensing Strategy (ALS) Update, CRAFT meeting November 3, 2022
- xLPR NRC Public Meeting Briefing January 19, 2023, ML 22363A572

# Safety and Environmental Benefits of High Burnup fuel and ALS

- Reduced risk of transportation accidents across entire fuel cycle due to reduced volume
- Reduced risk of fuel handling accidents within a plant due to smaller reload batch sizes
- Reduced high level waste to store on site, load into dry cask containers and eventually transport and store in a repository
- Improved economic performance for nuclear sites reduce the risk of early shutdown; thereby supporting US and international environmental goals of reduced greenhouse gases emissions
- Improved core design efficiency reduces Uranium environmental and radiological impacts during mining
- Higher burnup core designs support longer fuel cycles, fewer outages and lower risk of outage related safety challenges
- Higher burnup core designs support longer cycles which results in less plant personnel dose accumulation due to fewer refueling outages
- More effective use of limited NRC and industry resources by avoiding modeling and analysis of fuel dispersal consequences

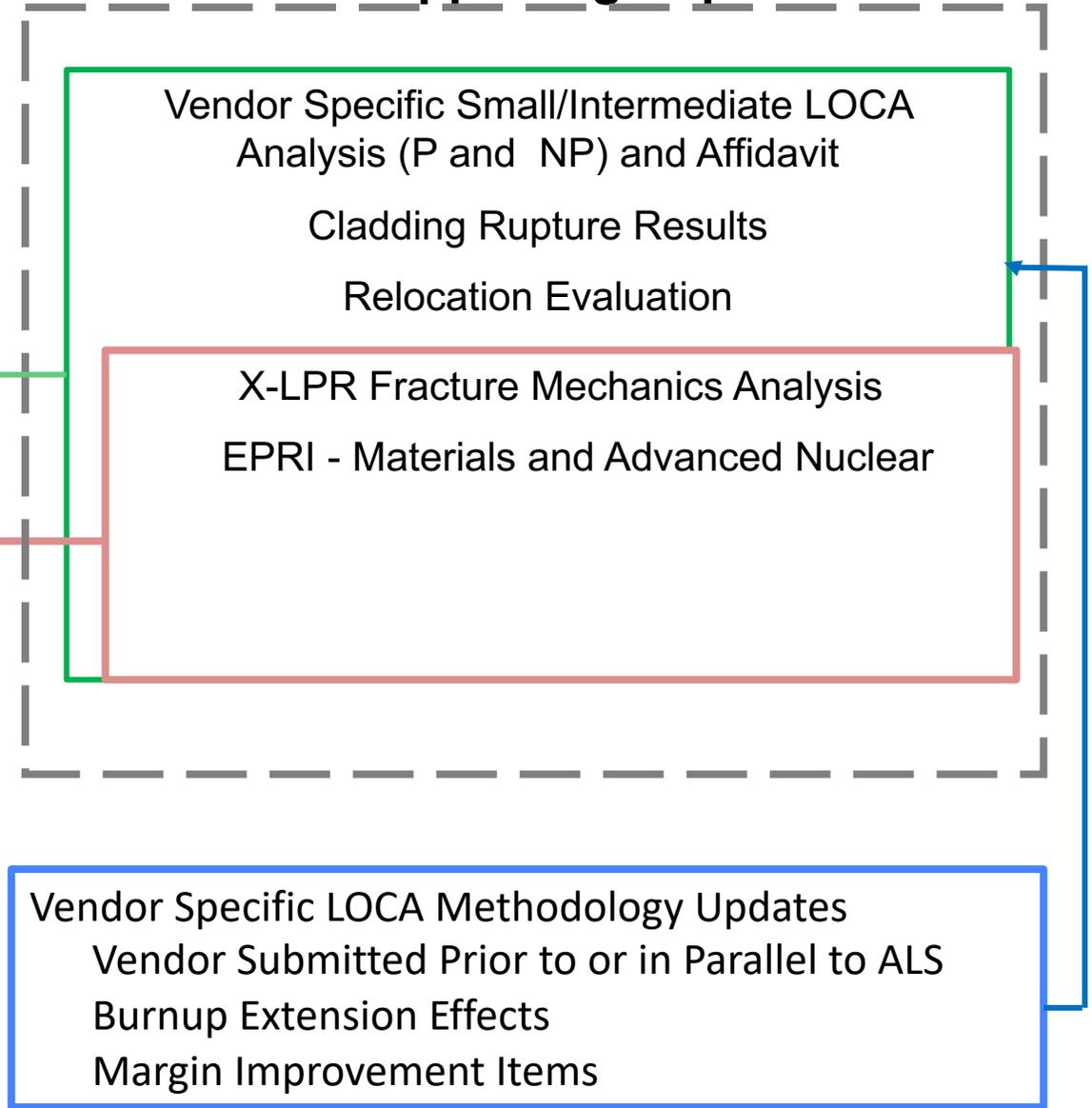
**ALS enhances benefits due to faster review/approval**

# EPRI Docketed Topical Report

- Topical Report Table of Contents
- Summary of Supporting Reports
- Integration of Analysis Results
- Regulatory Framework
- Exceptions to LBB Requirements
  - SRB 3.6.3
  - NRC Policy on LBB application to ECCS
- Justification for Crediting Operator Actions
- LBLOCA induced FFRD Risk Determination (Qualitative or Quantitative)
- Evaluation of Non-piping failures
  - Passive Components
  - Active Systems
- Defense-in-Depth
- Applicability Requirements

Utility LAR references EPRI TR for LOCA Induced FFRD

# Supporting Reports



# ALS Scope/Schedule

- **FFRD LOCA analysis**
  - Deterministic treatment of SBLOCA and IBLOCA
  - Application of LBB to LBLOCA Consistent with LBB applications
    - Limiting branch lines are the Accumulator Line Break (Cold Leg) and Pressurizer Surge Line (Hot Leg)
    - Justification of xLPR results and LBB Technical Specifications to preclude LBLOCA induced FFRD
- **Address non-piping LOCA**
  - Non-Piping Breaks – manways, component bodies, nozzles, heater sleeves
  - Active System Failures – Stuck open valves, pump seals
- **Schedule**
  - Submittal 4<sup>th</sup> quarter 2023 to 1st quarter 2024

A blue-tinted photograph of four people, two men and two women, standing in a row. They are all wearing white lab coats or work shirts with the EPRI logo on the chest. The woman on the far right is wearing a white hard hat. They are all smiling and looking towards the camera. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# Fuel Fragmentation Threshold

Suresh Yagnik  
Senior Technical Executive, EPRI

May 18, 2023

**U.S. NRC ACRS Fuels, Materials, and Structures Subcommittee Meeting**  
**Bethesda, MD**

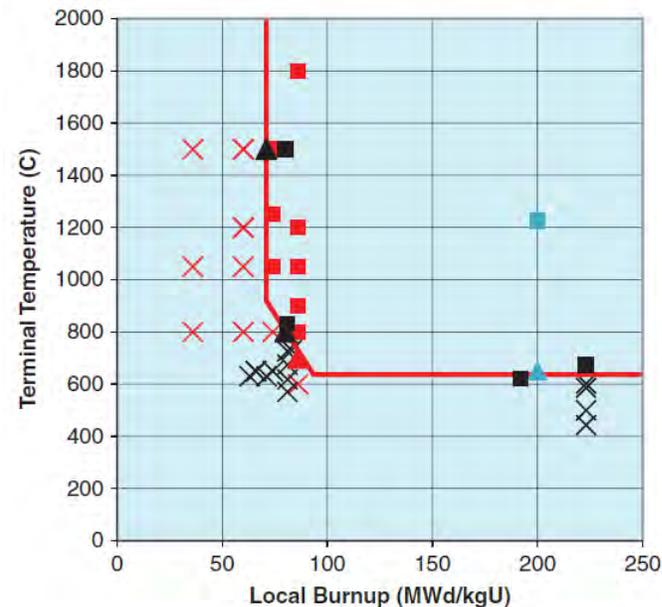


# Outline

- Best estimate Fuel Fragmentation (FF) threshold
- Scoping tests
- Mechanistic studies on IFA-649 fuel disc samples
- Summary and future outlook

# Best estimate fuel fragmentation threshold

- Separate effects, Halden (IFA-650 series), SCIP-III, and open literature data were evaluated and a best estimate threshold for FF recommended in 2015
  - Local temp and local burn-up dependent; easy to implement in fuel performance codes; published in open literature and used in DOE's BISON code and elsewhere
  - Can help assess mass of fuel that could be subject to fragmentation in a fuel rod

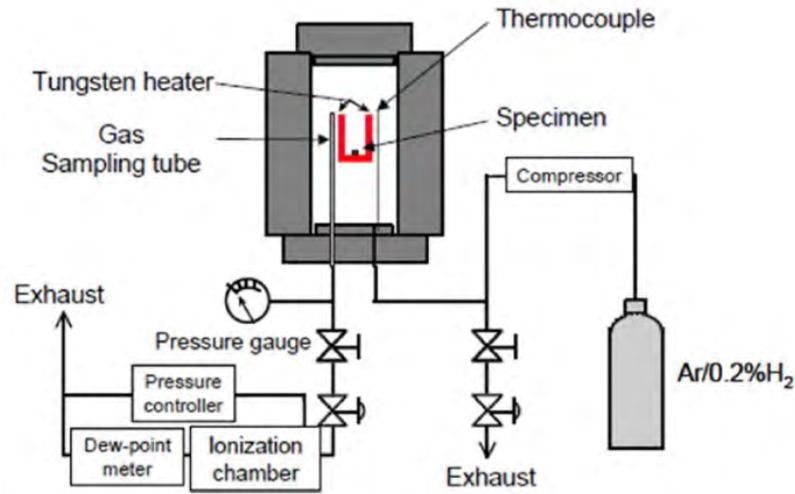


- Fragmentation limit (fuel local burn-up + terminal test temperature)

NUCLEAR SCIENCE AND ENGINEERING: 179, 477–485 (2015)

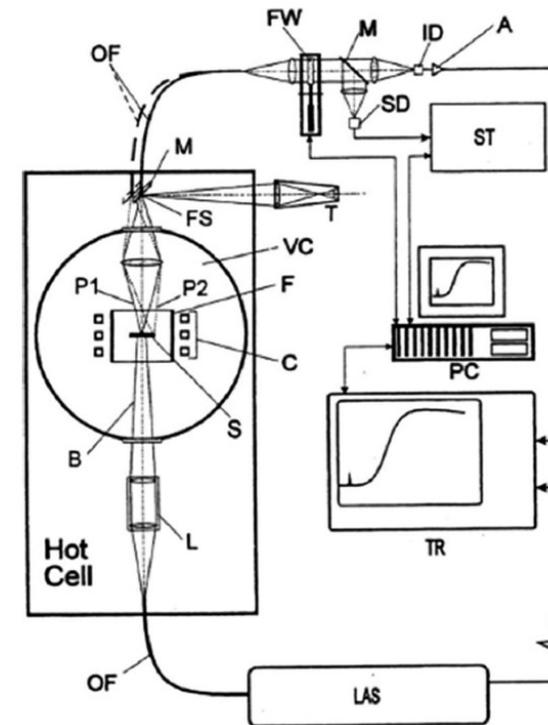
# Initial scoping studies using LWR irradiated fuels

M. Hirai et al.



- Very small samples
- Fast temperature ramps
- Effect of hydrostatic restraint pressure

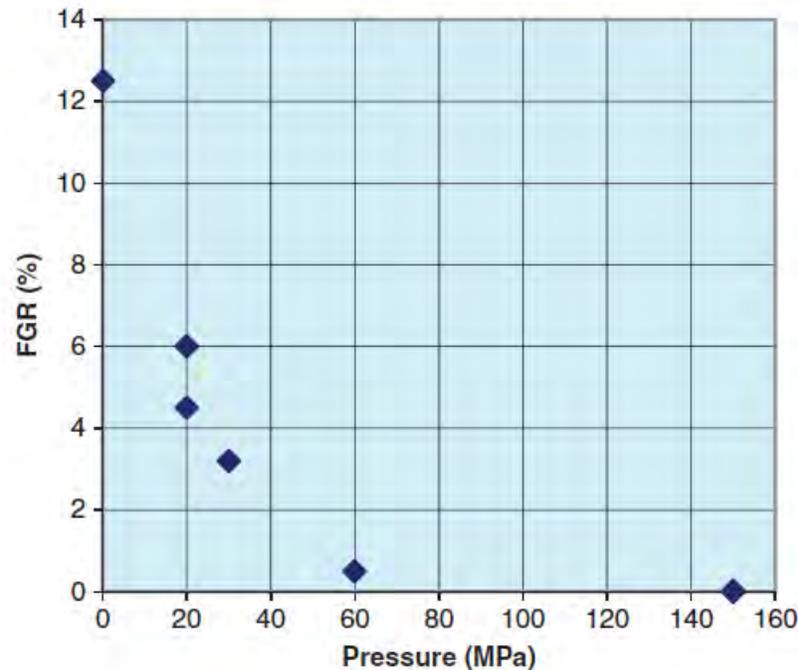
D. Staicu et al.



- Induction + multiple laser pulse heating
- Fragmentation temperature investigation
- Optical images after laser pulses

# Effect of external restraint

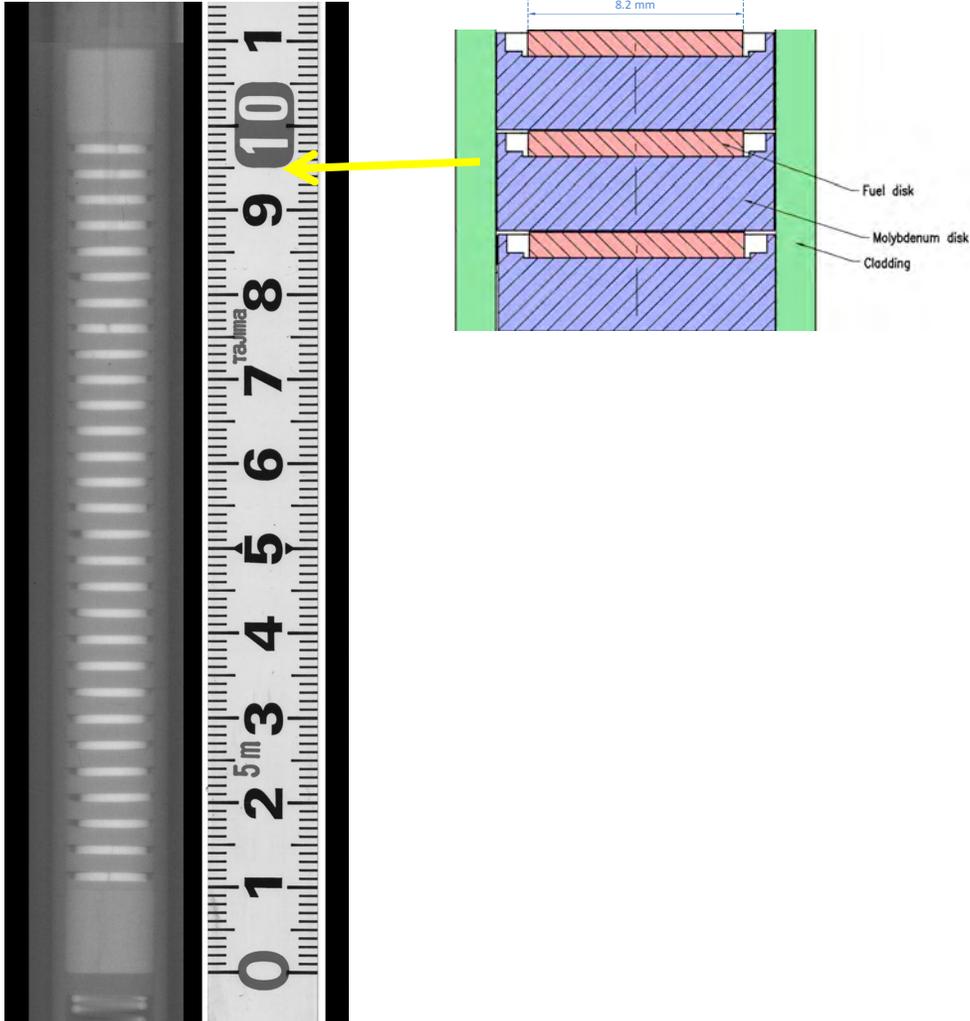
- Scoping tests clearly confirmed that PCMI restraint will reduce FF
- This was further confirmed on IFA-649 fuel disc samples at the LECA lab (CEA, Cadarache)



- High hydrostatic restraint pressures prevented fission gas release and thus fragmentation

NUCLEAR SCIENCE AND ENGINEERING: 179, 477–485 (2015)

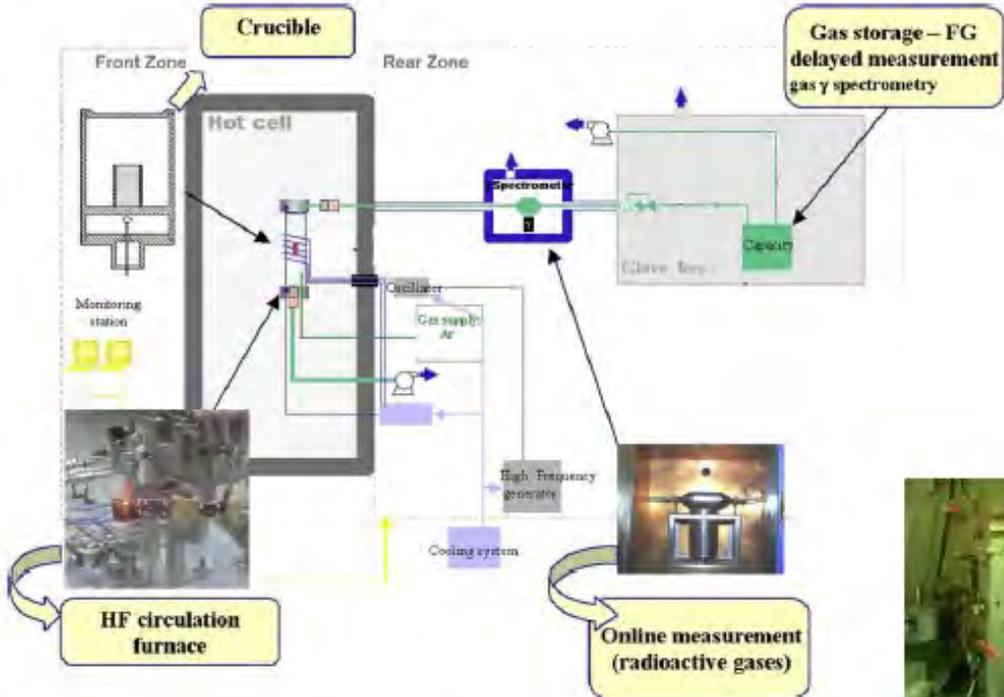
# Irradiation in IFA-649: UO<sub>2</sub> based fuel discs



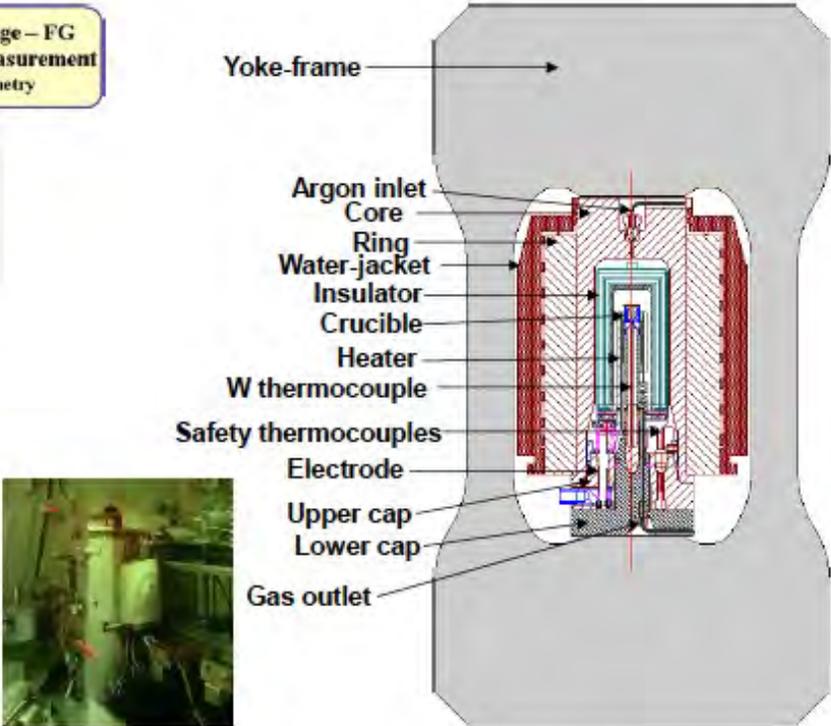
- Almost homogeneous burn-up and irradiation temp across fuel discs
- Fuel discs with no HBS, partial HBs, and full HBS microstructure discharged with a reactor scram to preserve 'at temperature' fuel characteristics
- Such unique fuel samples of known pedigree can not be retrieved from LWR rods
- Subsequent annealing performed in two hot cell devices (burn-up, ramp rate, external restraint) with simultaneous Kr-85 release measurements
- Extensive pre- and post- annealing characterizations, including particle size distribution

# Fuel sample annealing T (t) using two hot cell devices

Pontillon Y. et al. Hotlab 2005



Hanus E. et al. TopFuel 2016

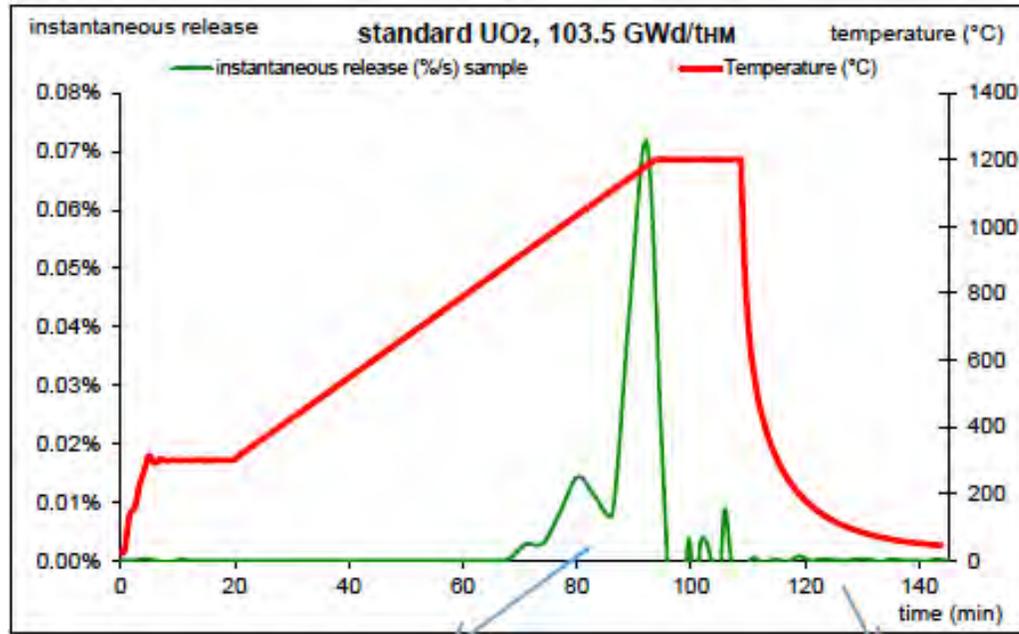


- MERARG : ~0.1 MPa, max 2800°C  
pellet size samples

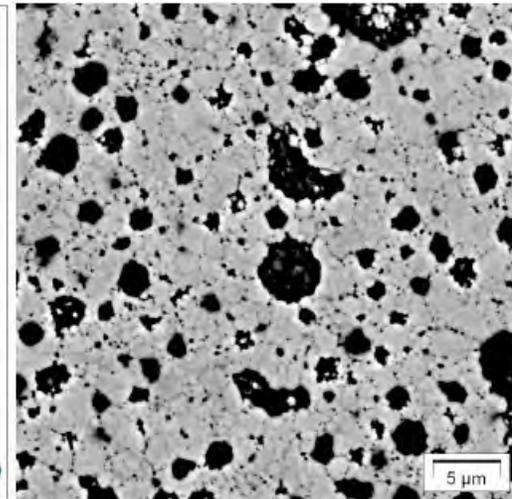
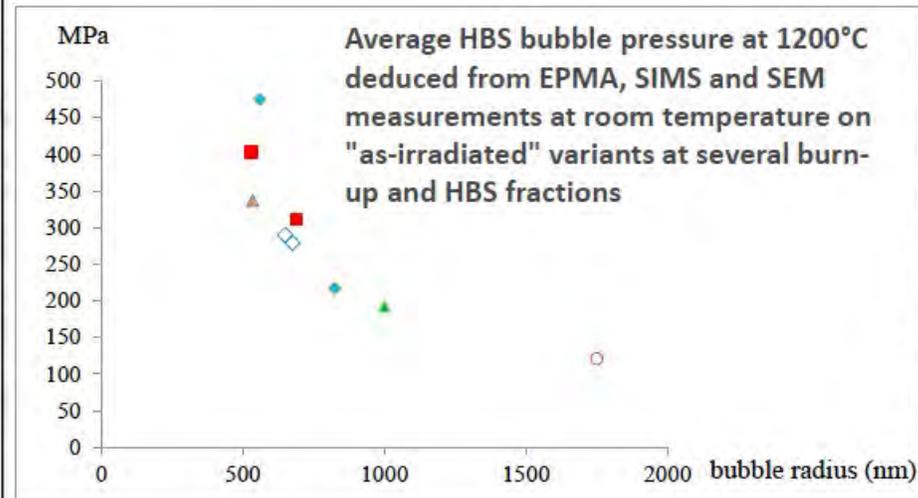
- MEXIICO : max 160 MPa 1600°C  
pellet size sample → unique capacities

# Mechanism and kinetics of gas release and fragmentation (1/4)

- Significant gas release occurs  $\sim 1200^{\circ}\text{C}$  in high burn-up fuel
- The onset of fragmentation is related to the pressure reached in the small HBS bubbles



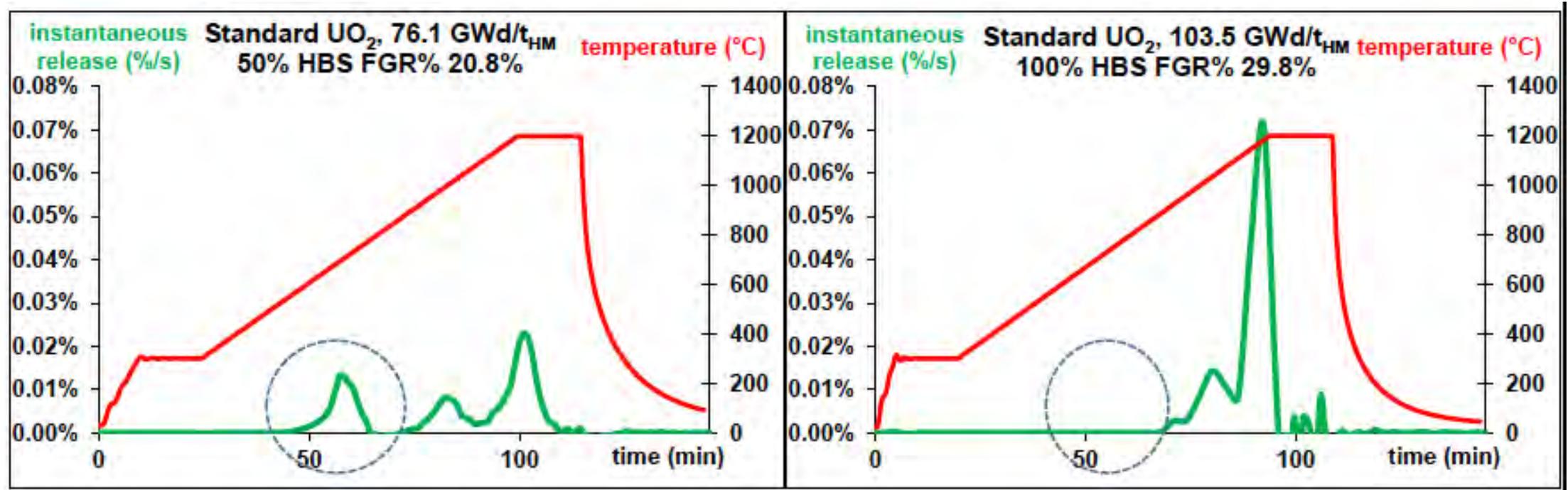
Measuring gas release upon heating



Estimation of pressure inside gas bubbles

# Mechanism and kinetics of gas release and fragmentation (2/4)

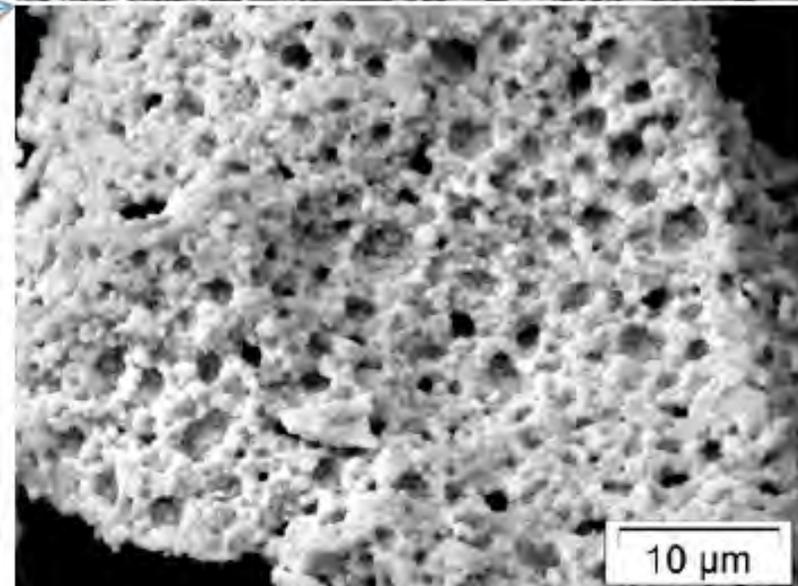
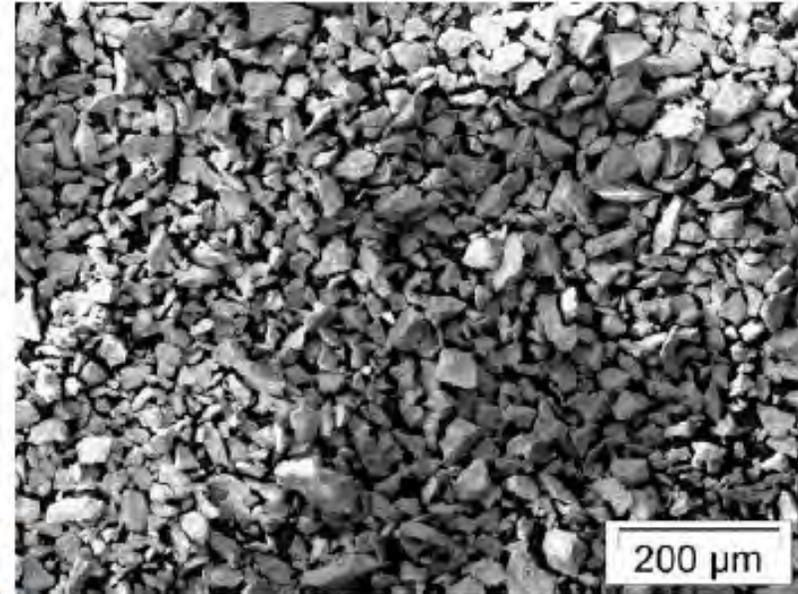
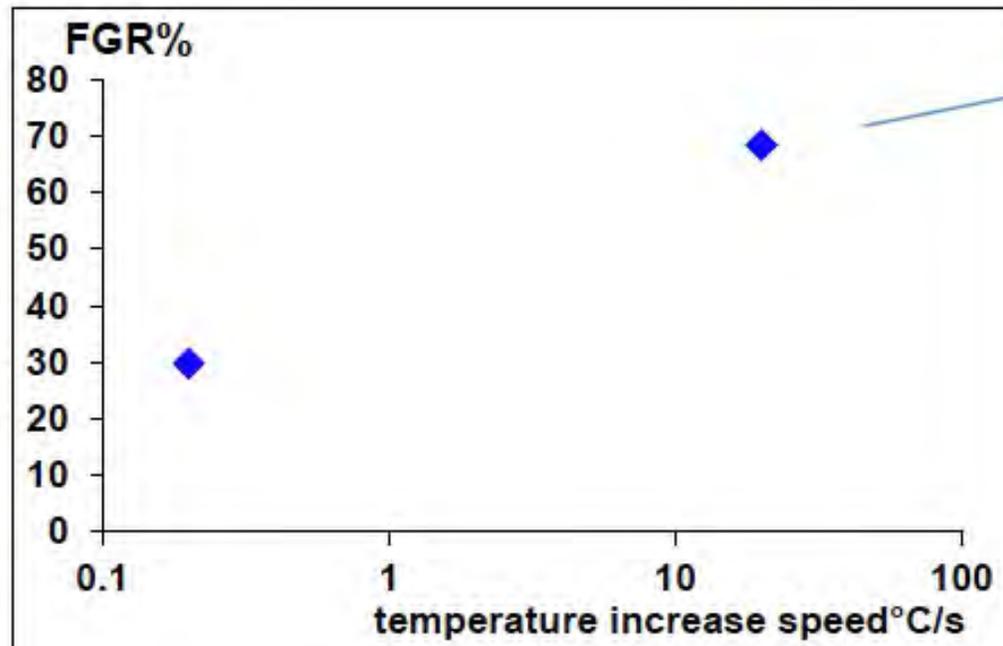
- Gas release begins at lower temperatures for the partially HBS transformed fuel than for fully transformed fuel



# Mechanism and kinetics of gas release and fragmentation (3/4)

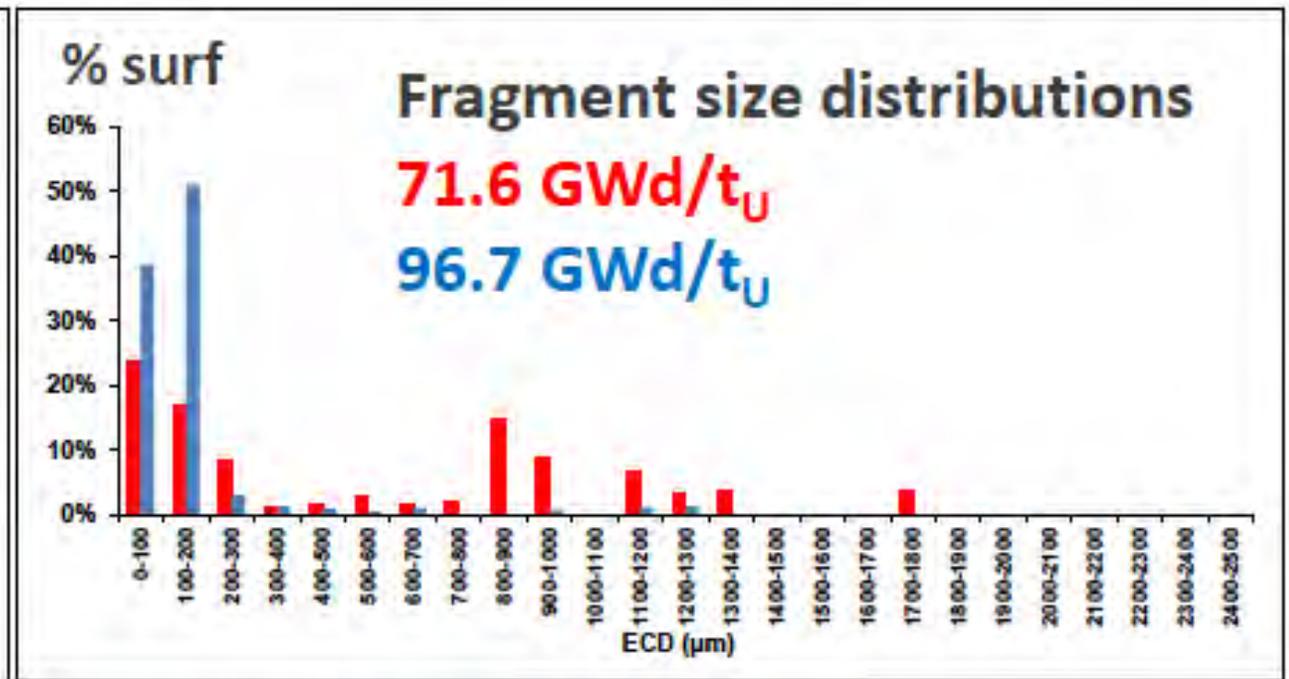
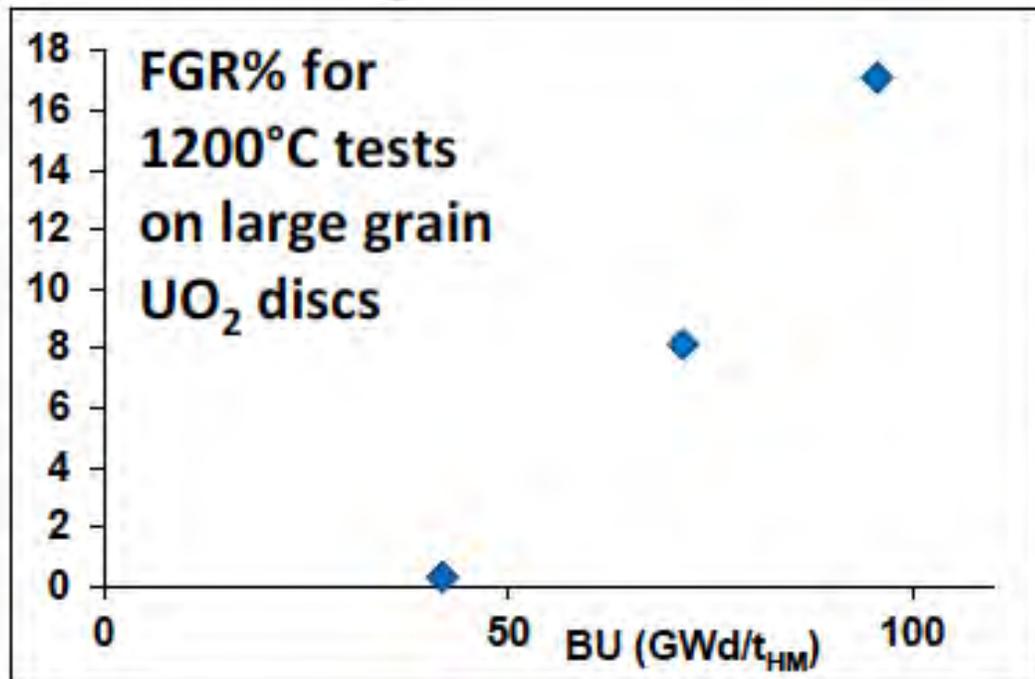
- Higher fission gas release and smaller fragments formed for a 20°C/s ramp rate than for a 0.2°C/s ramp rate

FGR% for 1200°C tests  
on UO<sub>2</sub> discs at 0.2°C/s and 20°C/s



# Mechanism and kinetics of gas release and fragmentation (4/4)

- Fuel with no HBS transformation showed no fragmentation in annealing, even up to 1600°C
- Fuel with partial and full HBS conversion fragmented during annealing to 1200°C
- The higher the HBS conversion, the higher the gas release and smaller the fragment size

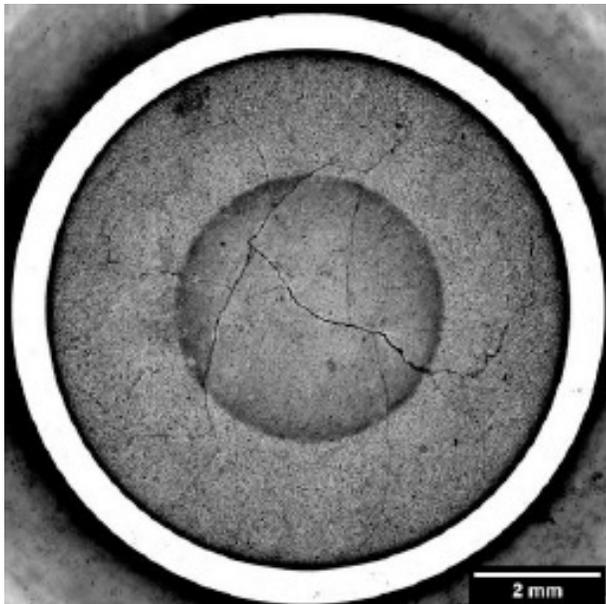


# Summary and conclusions

- Careful experimental work on almost homogeneous fuel material of known pedigree has been an efficient and cost-effective way to answer questions on fuel behavior in LOCA situations
- The initial scoping studies and subsequent detailed separate effects investigations on well-characterized fuel has provided fundamental insights into FF phenomenon
  - Effects of external restraint, % HBS transformation, estimated gas bubble pressures, and temp ramp rate on FF
- This work is still ongoing filling gaps in knowledge + PCMI/SCC works + burst release studies
- Plans are also underway to establish equivalence of IFA-649 fuel sample behavior with the behavior of HBS region of LWR fuel pellets
  - By harvesting samples from different radial zones of PWR fuel (next slide)

# Which part of pellet contributes most to FF?

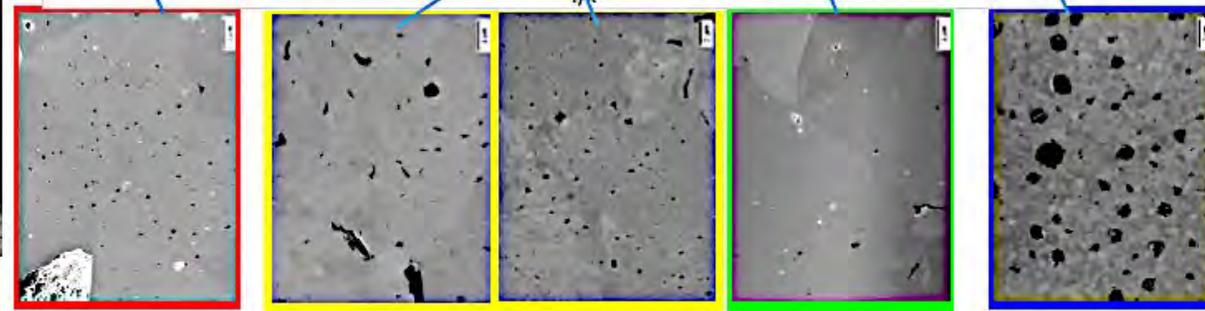
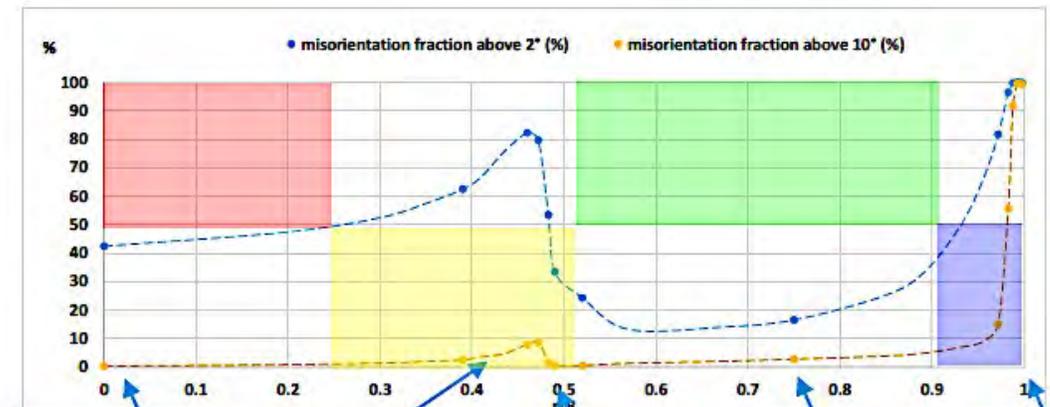
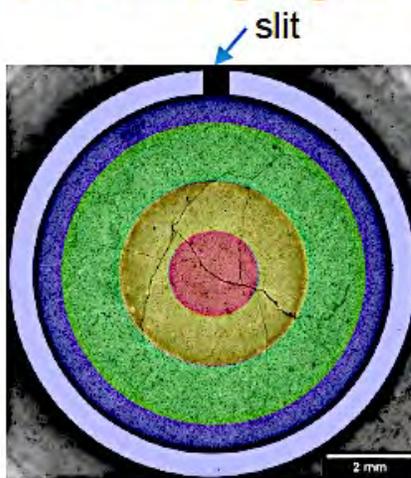
- Four axial-cores are prepared from two adjacent pellets (PWR fuel rod at high Bu)
  - Microstructure differences in each core characterized
  - Annealing performed separately on each core and fragment size distribution quantified



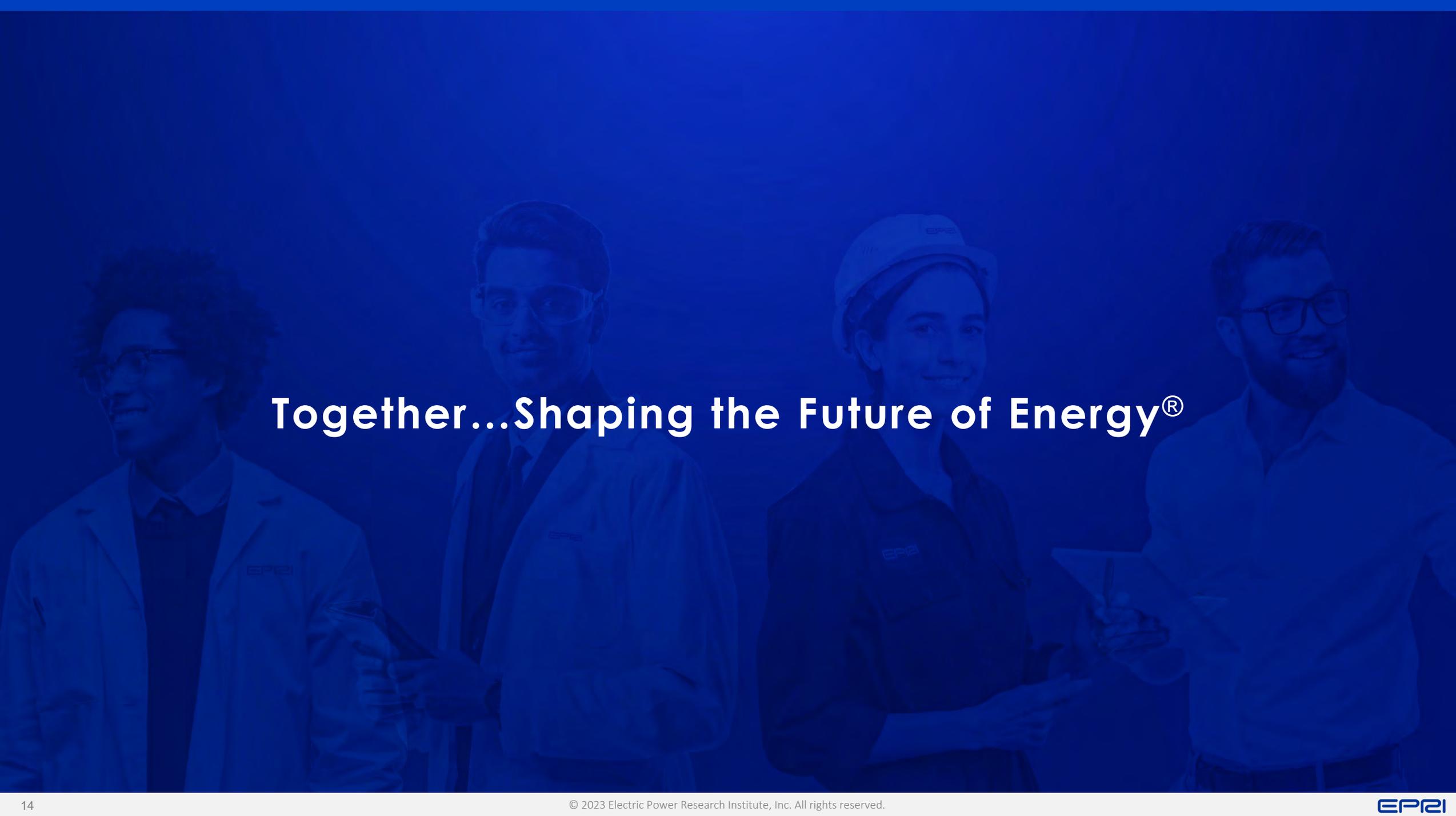
PWR fuel ceramograph at 7<sup>th</sup> span cross-section at local Bu 68.8 GWd/t

Misorientation fraction > 2° within original grain

Misorientation fraction > 10° within original grain



Microstructure of each zone characterized

A blue-tinted photograph of four people, two men and two women, standing in a row. They are all wearing white lab coats with the EPRI logo on the left chest. The woman on the far right is wearing a white hard hat. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# Atomistic Modeling of Cladding Coating Behavior

Erich Wimmer and Mikael Christensen  
Materials Design, Inc.

May 18, 2023

U.S. NRC ACRS Fuels, Materials, and Structures Subcommittee  
Meeting  
Bethesda, MD



# Outline

- Motivation and Objectives
- Key Results
- Modeling Approaches
- Computer Simulations:
  - Hydrogen ingress into Cr coating
  - Adhesion of Cr coating
  - Through-coating defects
  - Resistance of Cr coating to mechanical deformations
- Summary and Engineering Implications

# Motivation and Objectives

- This modeling effort has been initiated in response to ATF PIRT in 2018
- To gain a deeper understanding of the effect of Cr coating of Zr cladding on hydrogen pickup
- To find possible weaknesses of Cr coatings of Zr alloys, e.g., enhanced oxidation and HPU caused by through-coating defects.

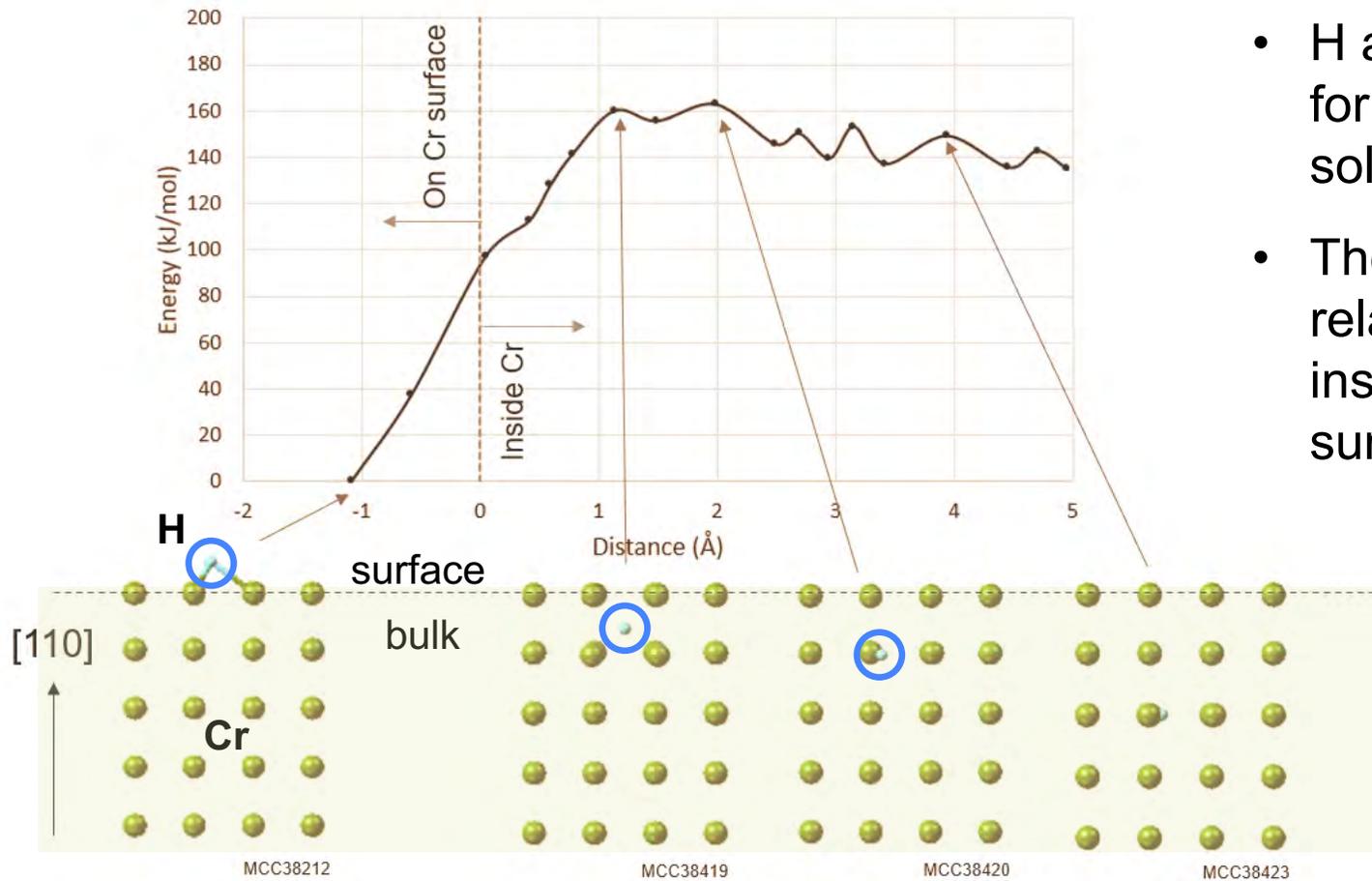
# Key Results

- Cr and Cr-oxide ( $\text{Cr}_2\text{O}_3$ ) are barriers for H ingress.
- Cr coatings bind very strongly to Zr surfaces and resist large mechanical deformations.
- Oxidation originating from through-coating defects is unlikely to spread much beyond this defect.

# Modeling and Simulation Approaches

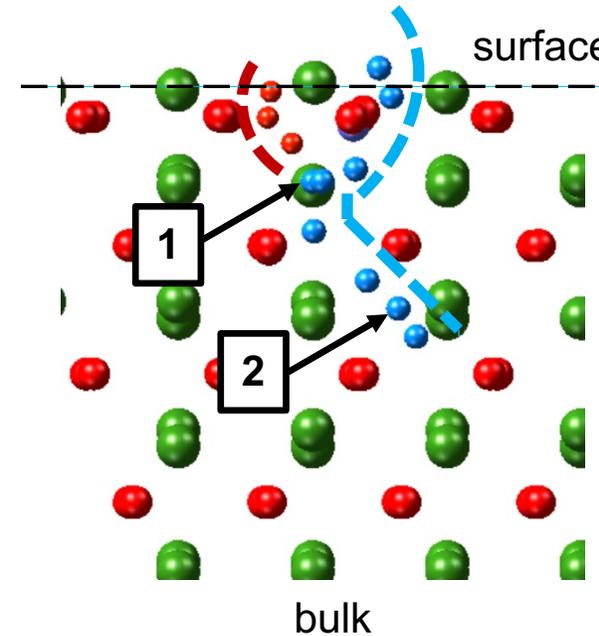
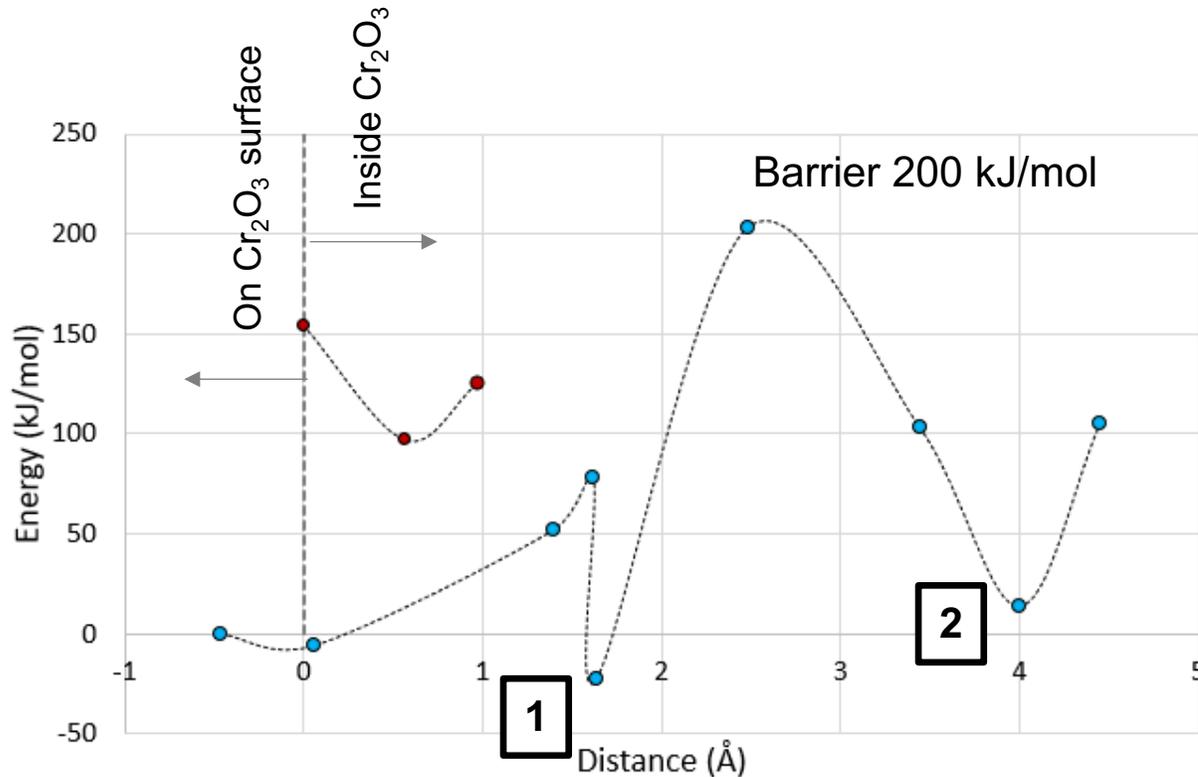
- First-principles quantum mechanical calculations
  - Prediction of thermodynamic, mechanical, and chemical material properties, e.g., interface energies
- Molecular dynamics simulations
  - Prediction of dynamic phenomena, e.g., diffusion, stress-induced plastic deformation, formation of dislocations, voids, and cracks
  - Use interatomic potentials derived from first-principles calculations employing machine learning methods
- Software
  - *MedeA* materials modeling environment with VASP for quantum mechanical computations and LAMMPS for large-scale molecular dynamics simulations.

# Hydrogen Ingress into Cr Coating



- H atoms face a high barrier of 160 kJ/mol for ingress into metallic Cr, i.e., the solubility of H in bulk Cr is low.
- The diffusion barriers for H inside Cr are relatively low (about 20 kJ/mol). If H were inside Cr, it would rapidly diffuse to surfaces.

# Hydrogen Ingress into $\text{Cr}_2\text{O}_3$ Scales

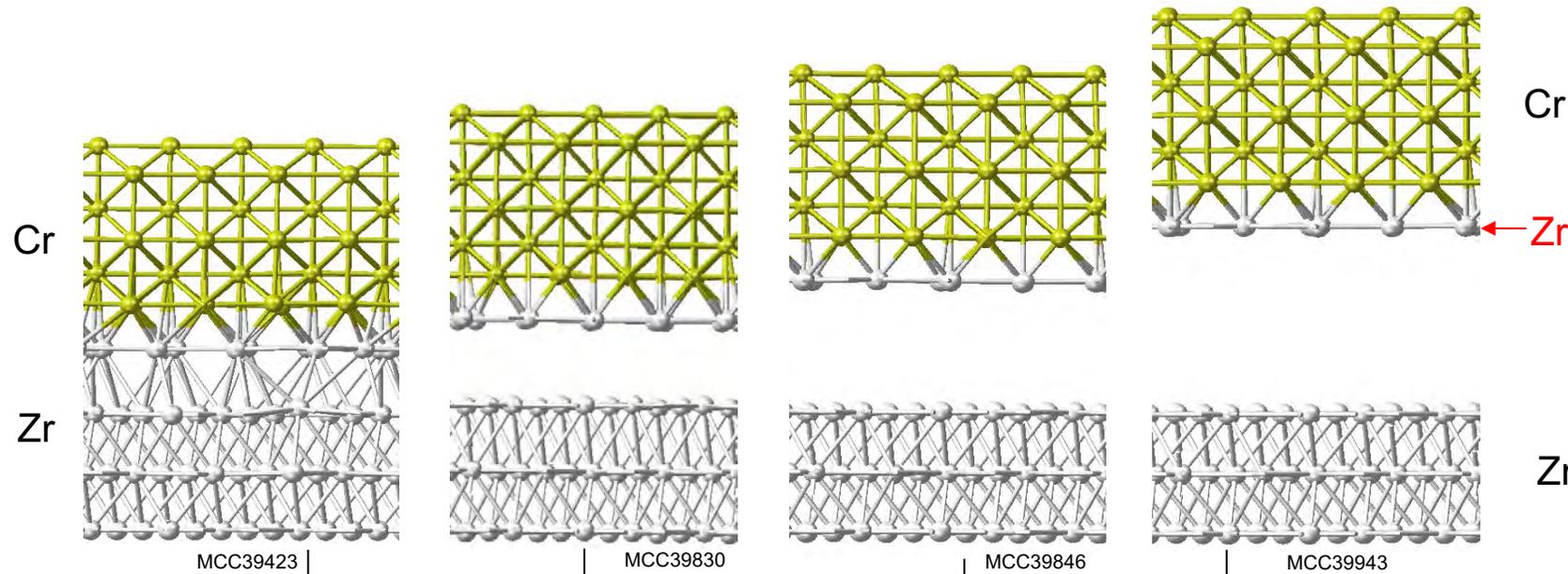


H atoms can be trapped in  $\text{Cr}_2\text{O}_3$  and have high diffusion barriers (about 200 kJ/mol).

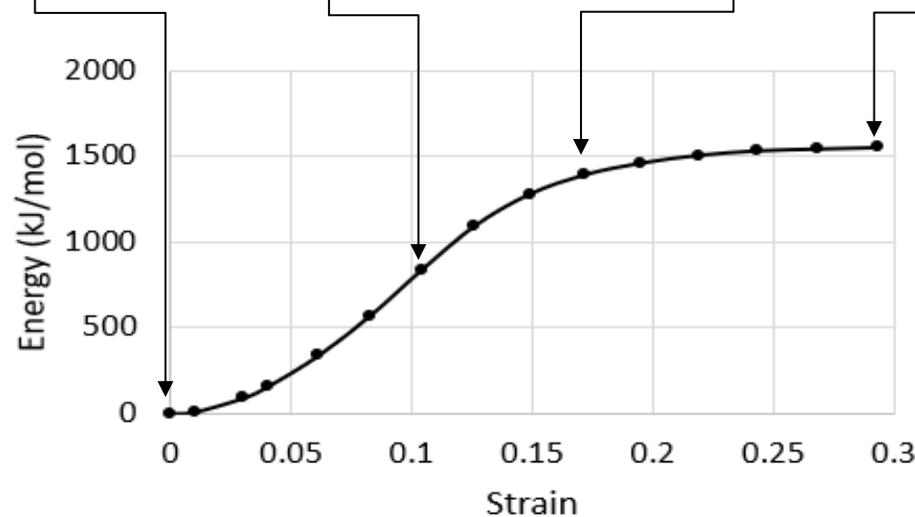
**Both Cr metal and  $\text{Cr}_2\text{O}_3$  are barriers for H ingress.**

Due to the protective nature of  $\text{Cr}_2\text{O}_3$ , oxidation of Cr is slower than that of Zr, thus leading to lower H production and lower HPU of Cr coated Zr.

# Chromium Coatings Bind Strongly to Zr Surfaces



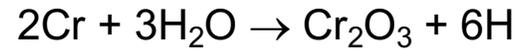
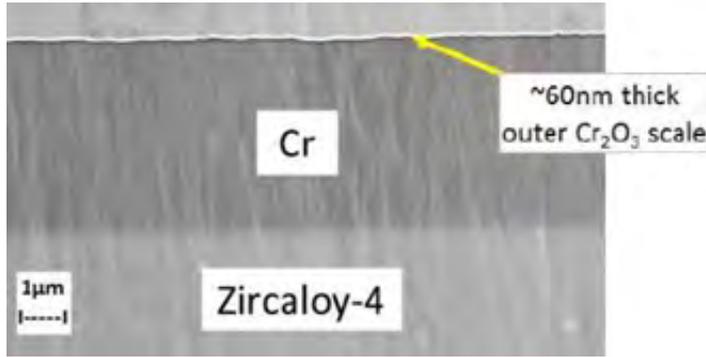
A monolayer of Zr remains on Cr coating, revealing a strong Zr-Cr bond.



Work of separating Cr coating from Zr(0001) surface: **2.6 J/m<sup>2</sup>**

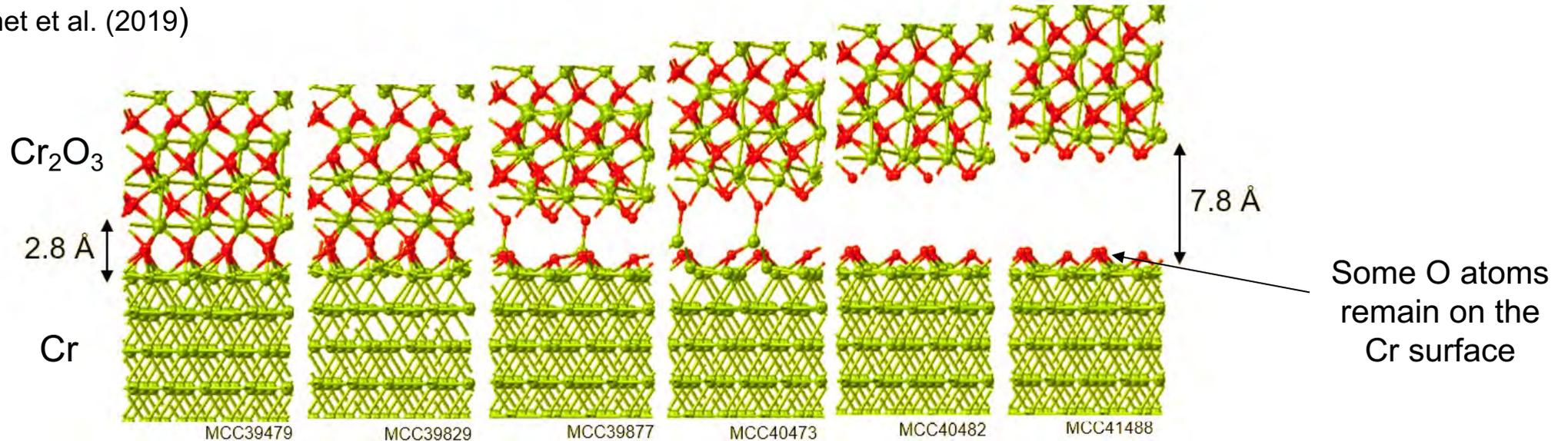
Work of separating pure Zr along (0001) planes: **3.2 J/m<sup>2</sup>**

# Chromia ( $\text{Cr}_2\text{O}_3$ ) Adheres Strongly to Cr Surfaces



The surface of Cr is oxidized by water and covered with a thin  $\text{Cr}_2\text{O}_3$  scale which adheres strongly to the Cr coating. The reaction of Cr with water releases H.

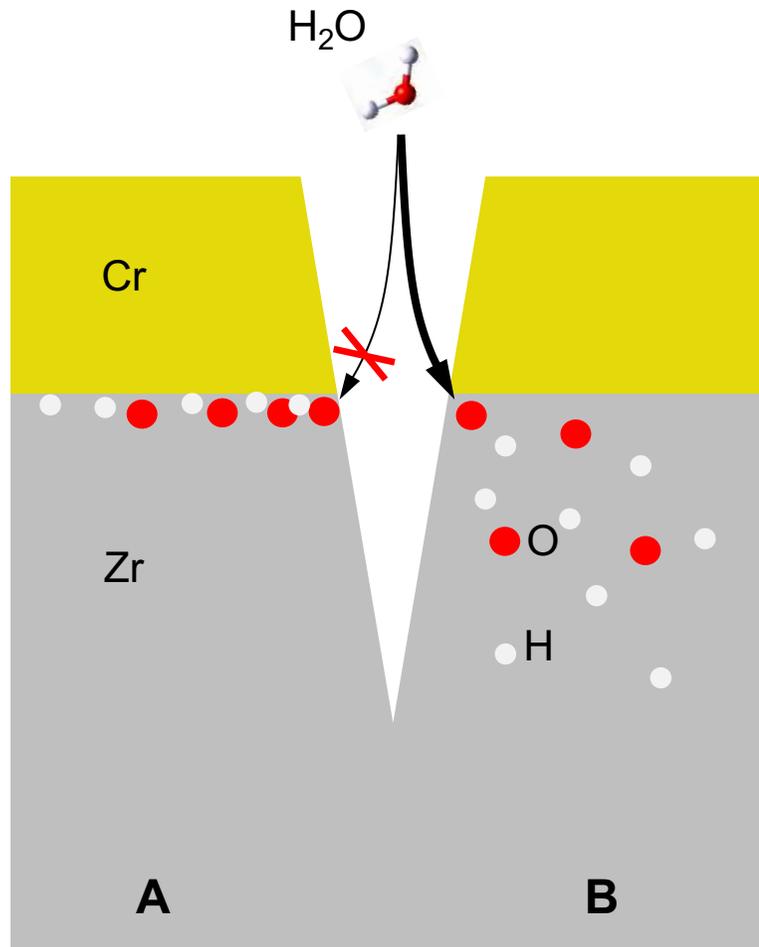
Images from Brachet et al. (2019)



Work of separating  $\text{Cr}_2\text{O}_3$  from Cr surface: **3.1 J/m<sup>2</sup>**

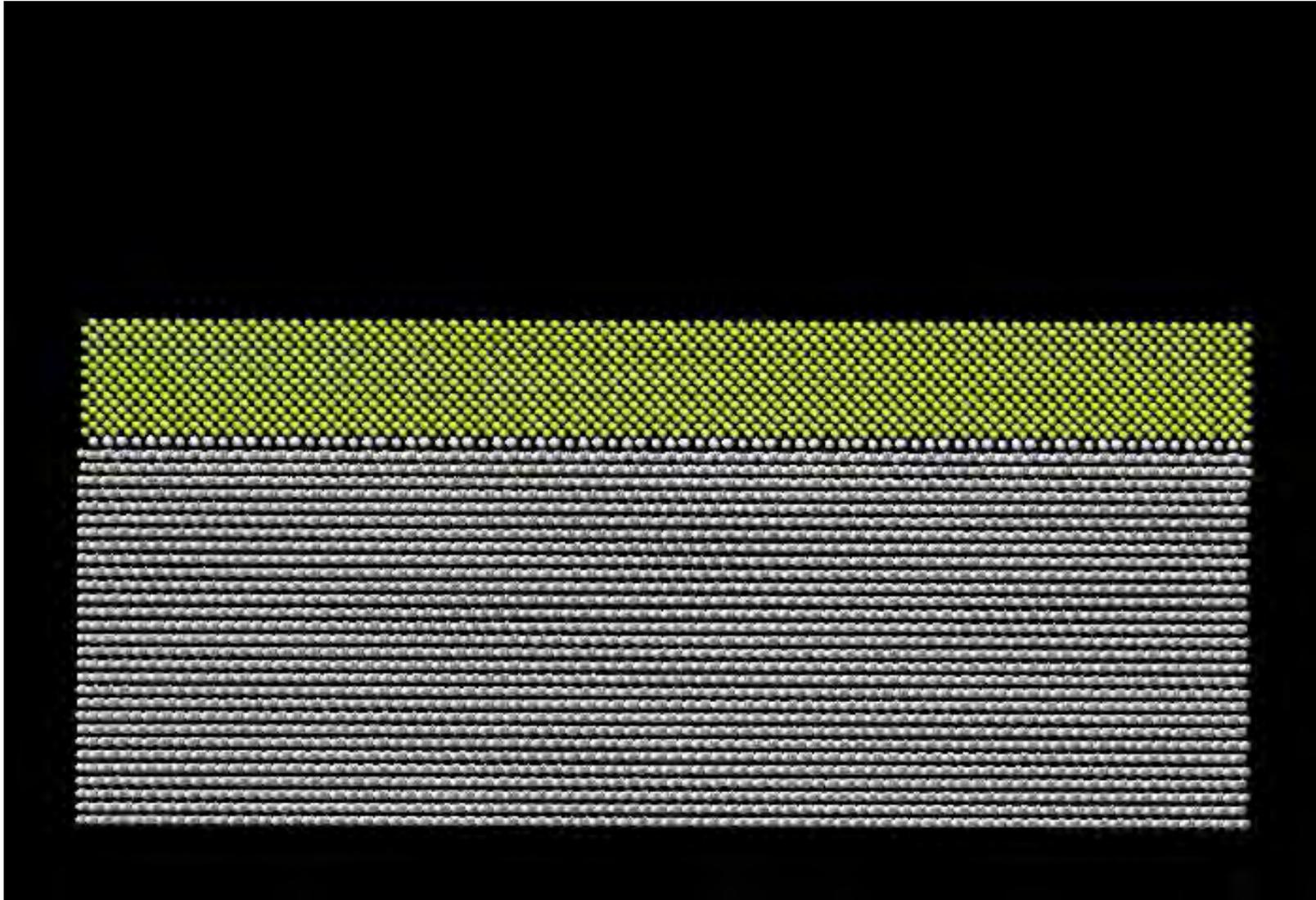
Comparison: Work of separating pure Zr along (0001) planes: **3.2 J/m<sup>2</sup>**

# Through-Coating Defects



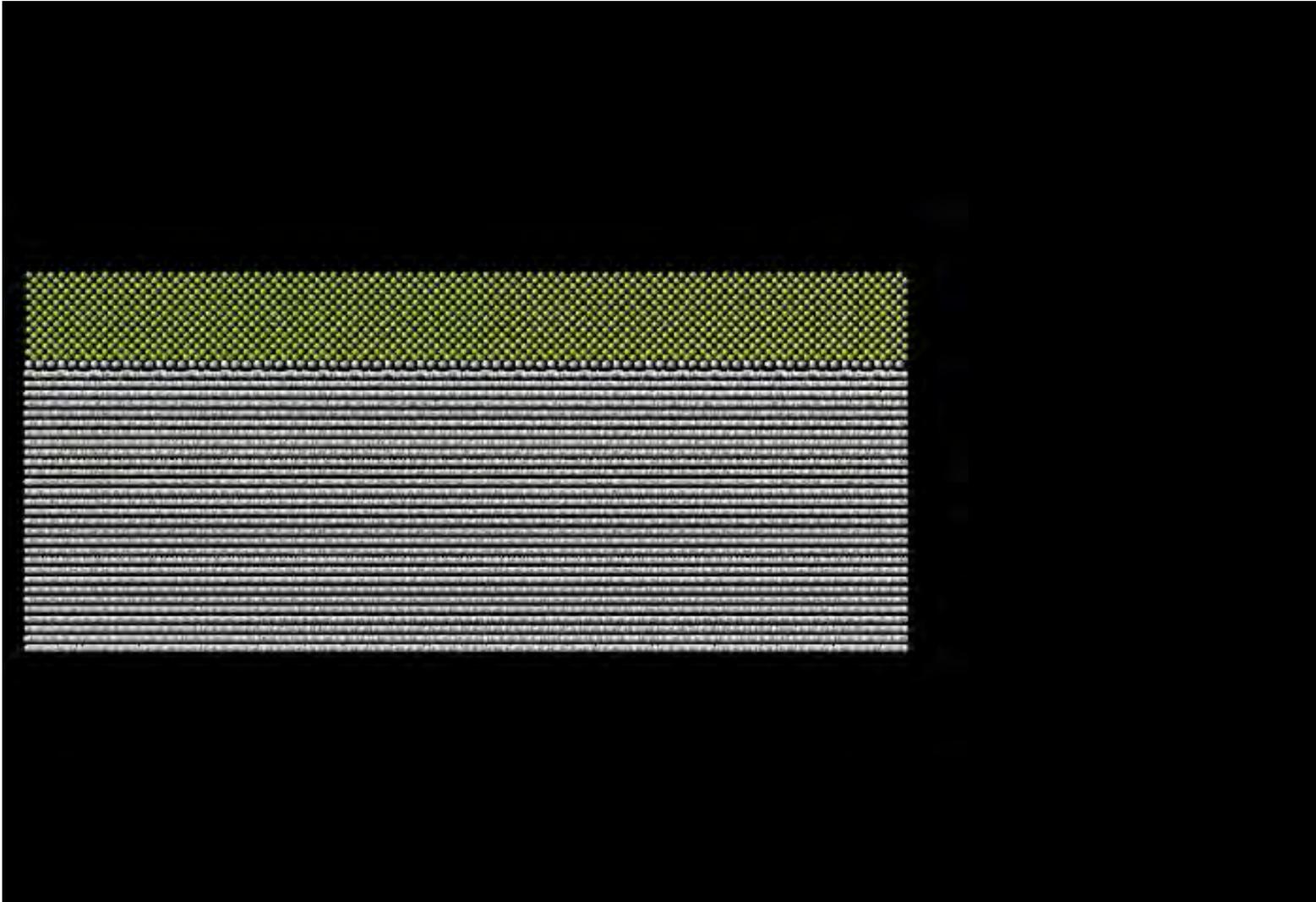
- Atomistic simulations show that water molecules preferentially dissociate on the Zr side of an exposed Cr/Zr interface.
- The reactivity of Zr at the Zr/Cr interface is similar to that on pure Zr without a Cr coating.
- **O and H atoms from water dissociation at an exposed Cr/Zr interface will absorb predominantly into bulk Zr (case B) rather than accumulate at the interface (case A).**
- O and H atoms are unlikely to diffuse into bulk Cr.
- Thermodynamics precludes the formation of Cr<sub>2</sub>O<sub>3</sub> in the proximity of unoxidized Zr.
- Given a sufficient O source, O-saturated  $\alpha$ -Zr at the base of a through-thickness Zr/Cr coating defect will transform into Zr oxides, as it would without a Cr coating. This oxidation process will create a local interface between Zr-oxides and Cr.

# Mechanical Properties of Cr-Coating: Delamination



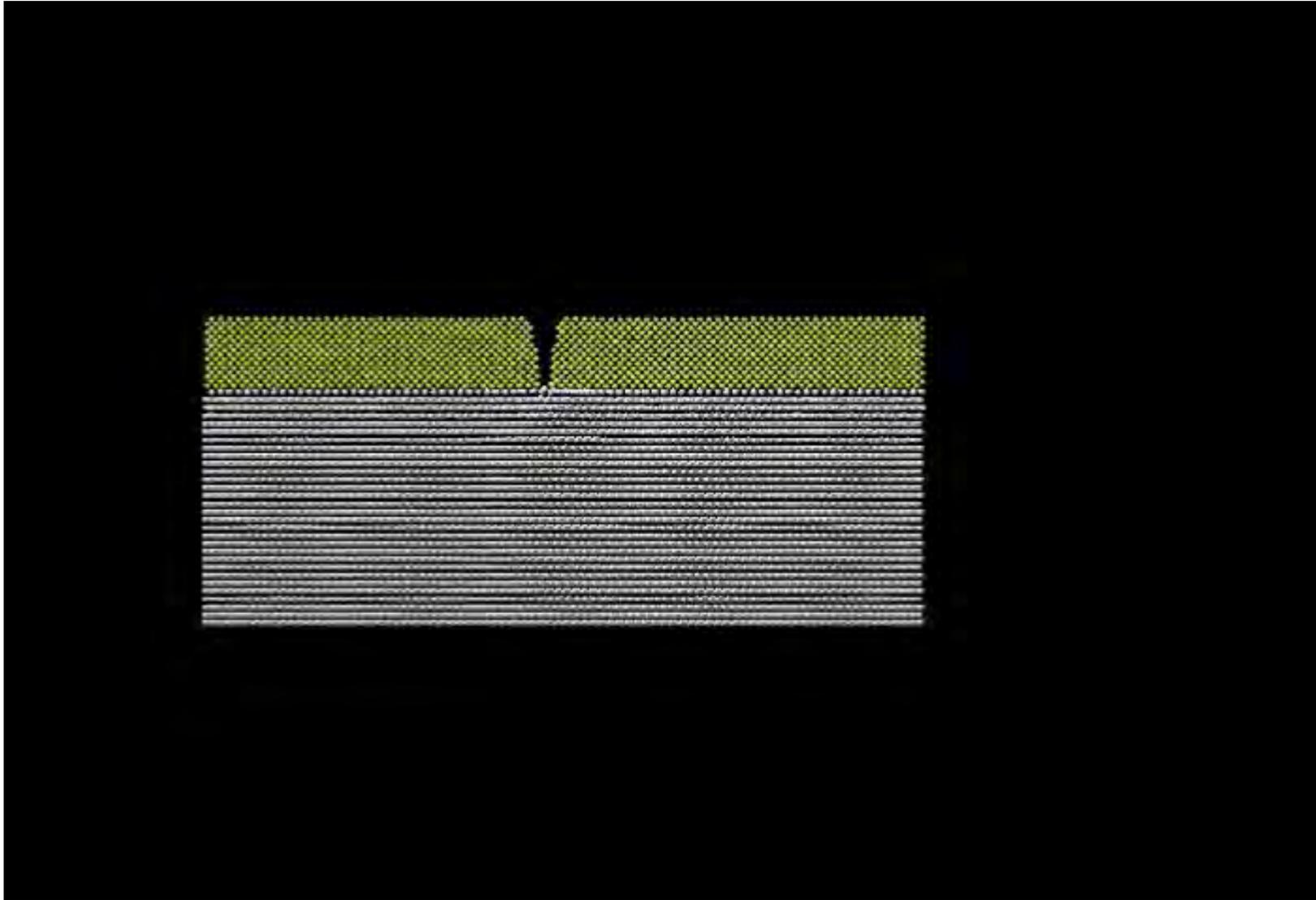
- Delamination of a Cr coating from a Zr substrate leaves a monolayer of Zr atoms on the Cr coating.
- Molecular dynamics simulation at 600 K using machine-learned interatomic potential trained on ab initio data.

# Mechanical Properties of Cr-Coating: Lateral Strain



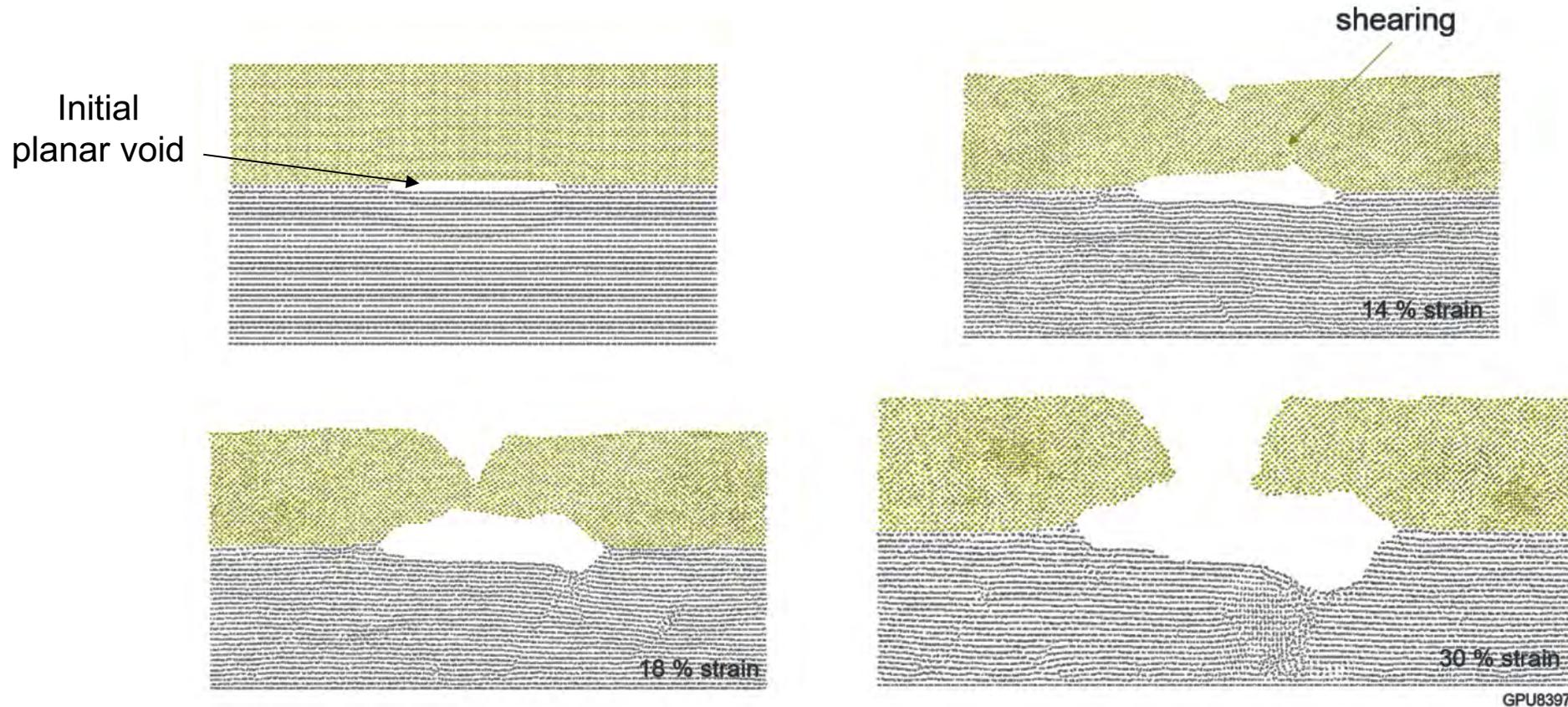
- Shearing inside the Cr coating occur almost simultaneously with shearing inside the Zr substrate.
- The Cr coating remains adherent up to large strains until through-coating gaps expose the underlying Zr.

# Mechanical Properties of Cr-Coating with Crack



- Under lateral strain, a pre-existing crack in the Cr coating causes pitting of the exposed Zr substrate.

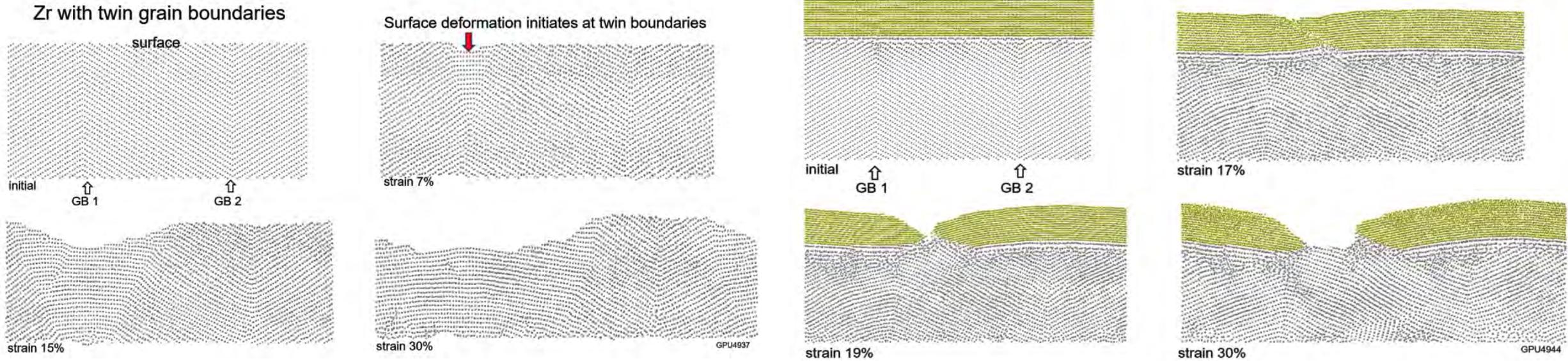
# Effect of Voids at Interface



- Due to the initial planar void at the interface, a large area of Zr becomes exposed.
- The initial contact area of the Cr/Zr interface remains intact.

# Effect of Tilted Zr Substrate

Suggested by Rob Daum



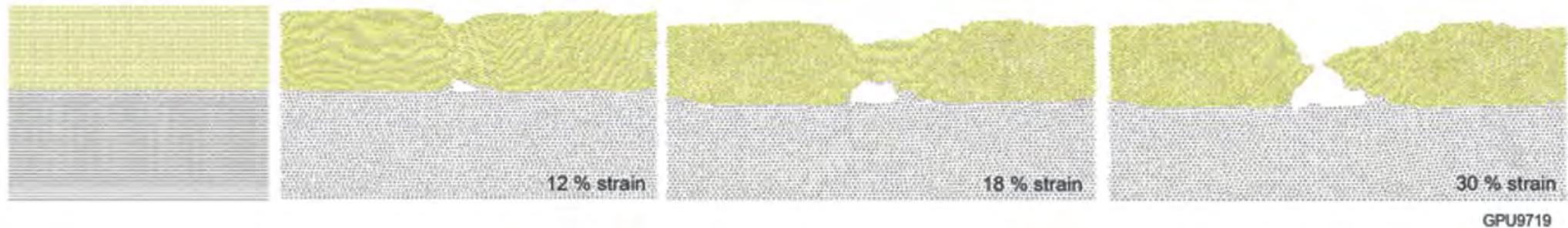
- A larger strain (17 % vs. 10 %) is required to initiate shearing with the tilted substrate compared to a Zr substrate with the (0001) planes parallel to the interface.
- The Zr substrate is exposed at similar strains for the tilted and parallel case (19 % vs. 18% )

# Effect of Intermetallic $ZrCr_2$ Phase at Interface

With  $ZrCr_2$  precipitate



Without precipitate



- At 15% strain, a void forms inside the precipitate, further strain causes the formation of a second void which extends to the surface; finally, shearing inside the intermetallic phase leads to exposure of the Zr substrate.
- The reference simulation without the precipitate shows the formation and growth of a void at the interface which eventually exposes the Zr substrate.

# Summary and Engineering Implications – Benefits of Cr (I)

## The present atomistic simulations support the viability of Cr coating of Zr cladding in PWR's

- Cr coating reduces the rate of oxidation.
- A  $\text{Cr}_2\text{O}_3$  scale and metallic Cr coating are barriers for H ingress.
- The adhesion of a Cr coating to Zr surfaces is very strong and resists large strains.
- Corrosion at through-coating defects is similar to that of un-coated Zr.
- Atoms of O and H created in a through-coating defect by reaction with water do not preferentially diffuse along the Cr-Zr interface but diffuse into bulk Zr; there is no significant driving force for oxide or hydride formation at Cr/Zr interfaces.
- The presence of O on the Zr substrate prior to Cr coating would not be expected to have dramatic effects on Cr adhesion.
- Cr coating adhesion to Zircaloy or Zr-Nb alloy substrates is likely to be equally robust.

# Summary and Engineering Implications – Benefits of Cr (II)

- The presence of  $ZrCr_2$  precipitates at the Cr/Zr interfaces has no major impact on the resilience of the coating.
- Tilting of the basal plane of crystalline Zr substrates by  $30^\circ$  relative to the surface normal increases the strain at which shearing in the Cr coating occurs. Once initiated, exposure of the underlying Zr substrate proceeds faster compared with un-tilted substrate grains. However, the strain to exposure is similar in both cases.
- Under very large tensile in-plane strains, voids form close to the Cr/Zr interface inside the Cr coating. The present simulations show that the effect of these voids remains localized and is unlikely to lead to spallation and decohesion.
- Compressive pre-straining was found to make a Cr coating more resistant to tensile stresses that may develop during service.

# Potential Engineering Concerns

- Formation of zirconium hydrides at the Cr/Zr interface weakens its strength.
- Precipitation of  $ZrFe_2$  at the Cr/Zr interface may increase the brittleness of the interface.
- Pre-existing voids at the Cr/Zr interface may lead to pitting and thus expose large areas of the Zr substrate.
- Above the eutectic temperature (2430 °F) the Cr coating will be dissolved. This temperature is much lower than the melting temperature of pure Zr (3371 °F).
- The behavior of Cr coating under irradiation is unclear and has not yet been investigated by simulations.

# Acknowledgements

This work represents the product of a team effort, and I want to thank the EPRI participants for their support and advice, and all my colleagues at Materials Design, especially

Volker Eyert

Clive Freeman

Clint Geller

Benoit Minisini

Walter Wolf

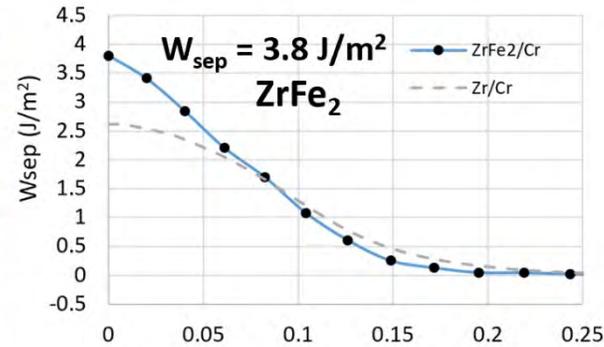
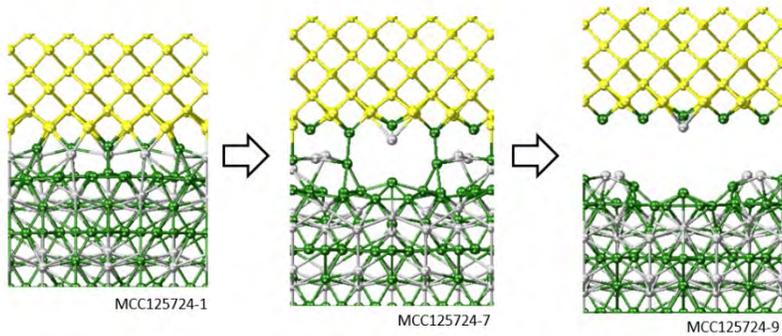
A blue-tinted photograph of four people standing in a row. From left to right: a woman with curly hair and glasses wearing a white lab coat with 'EPRI' on the pocket; a man with glasses wearing a white lab coat with 'EPRI' on the pocket; a woman wearing a white hard hat and a dark polo shirt with 'EPRI' on the pocket; and a man with glasses and a beard wearing a light blue button-down shirt. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

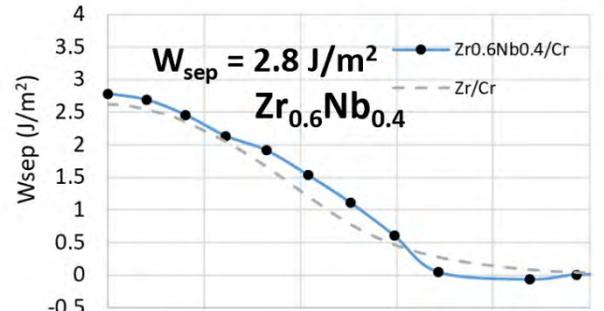
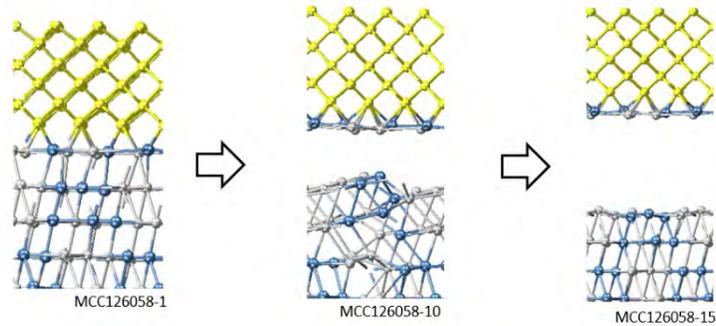


# BACKUP SLIDES

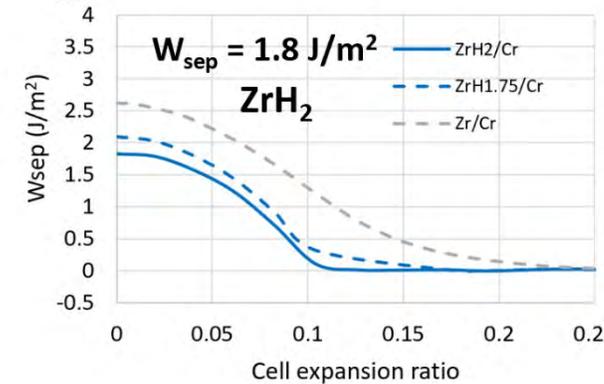
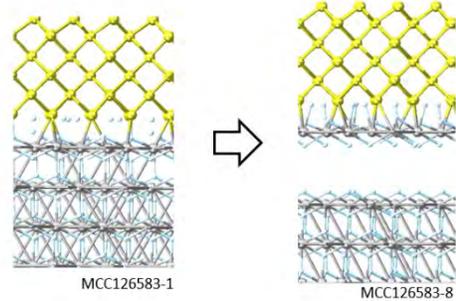
# Effect of Precipitates on Interface Strength



- Precipitation of ZrFe<sub>2</sub> strengthens the interface, but potentially introduces brittleness

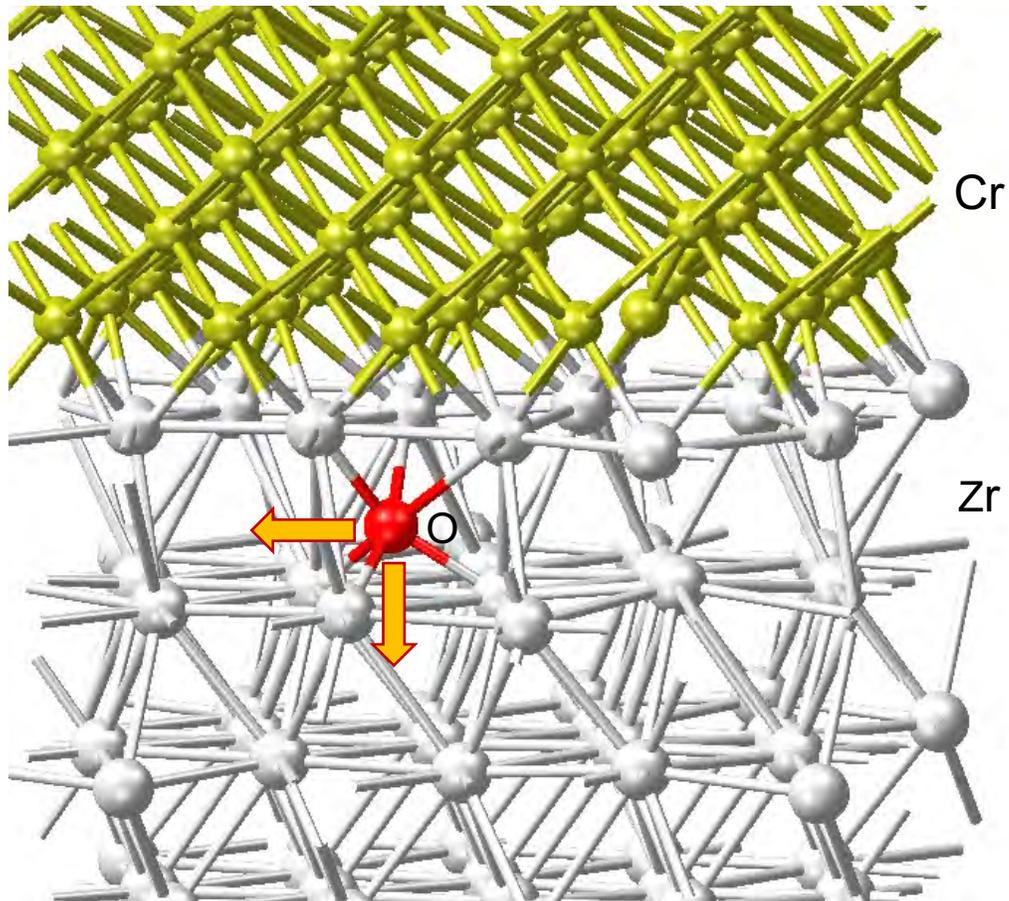


- β-phase Nb precipitates have little effect



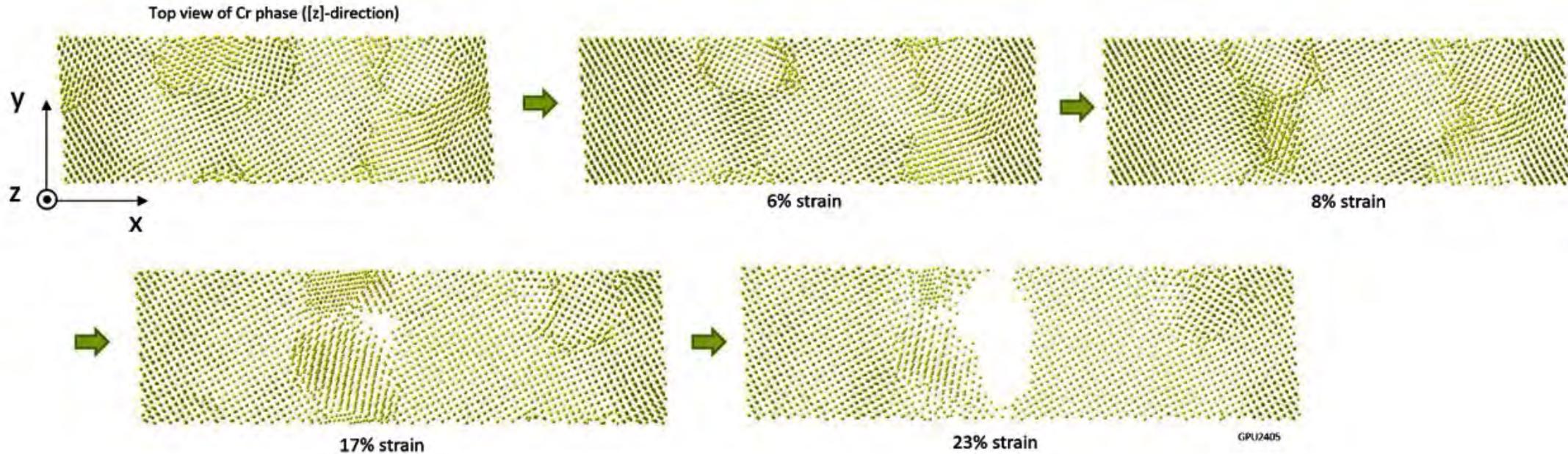
- Zr hydrides could be detrimental

# Oxygen at the Cr/Zr Interface



- Oxygen atoms are thermodynamically more stable in bulk Zr than at a Zr/Cr interface.
- The diffusivity of O parallel to a Zr/Cr interface is substantially the same as that of O in bulk Zr.
- Hence, O atoms entering Zr from a through-coating defect primarily will diffuse into the bulk Zr phase, rather than accumulating at the interface.

# Effect of Strain on Columnar Cr Grains



- Subject to tensile strain, a model with columnar grains (shown above) expose the underlying Zr at a strain of 17%, which is similar to that of a monocrystalline Cr coating.

# Collaborative Research on Advanced Fuel Technologies for LWRs (CRAFT)

Kurshad Muftuoglu  
Technical Executive

May 18, 2023

## ACRS Fuel, Materials, and Structures Subcommittee Meeting

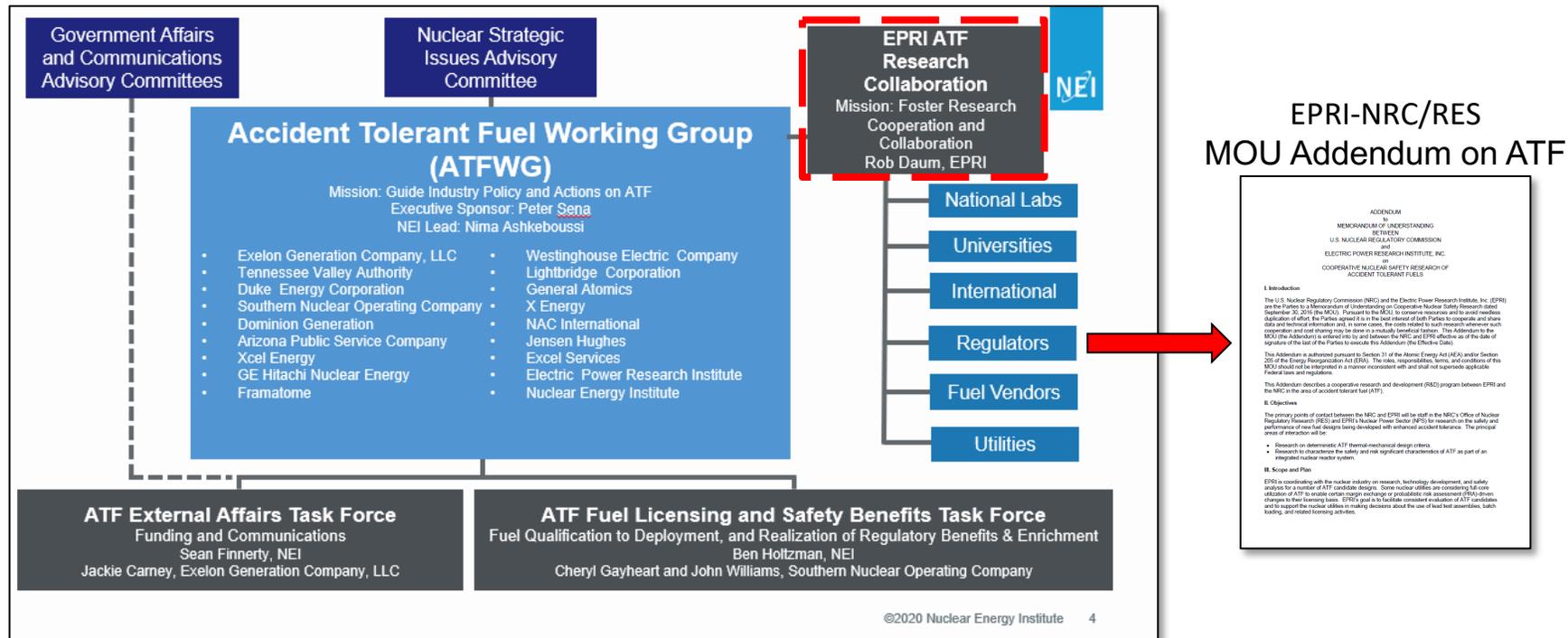




# Collaborative Research on Advanced Fuel Technologies for LWRs (CRAFT) Framework

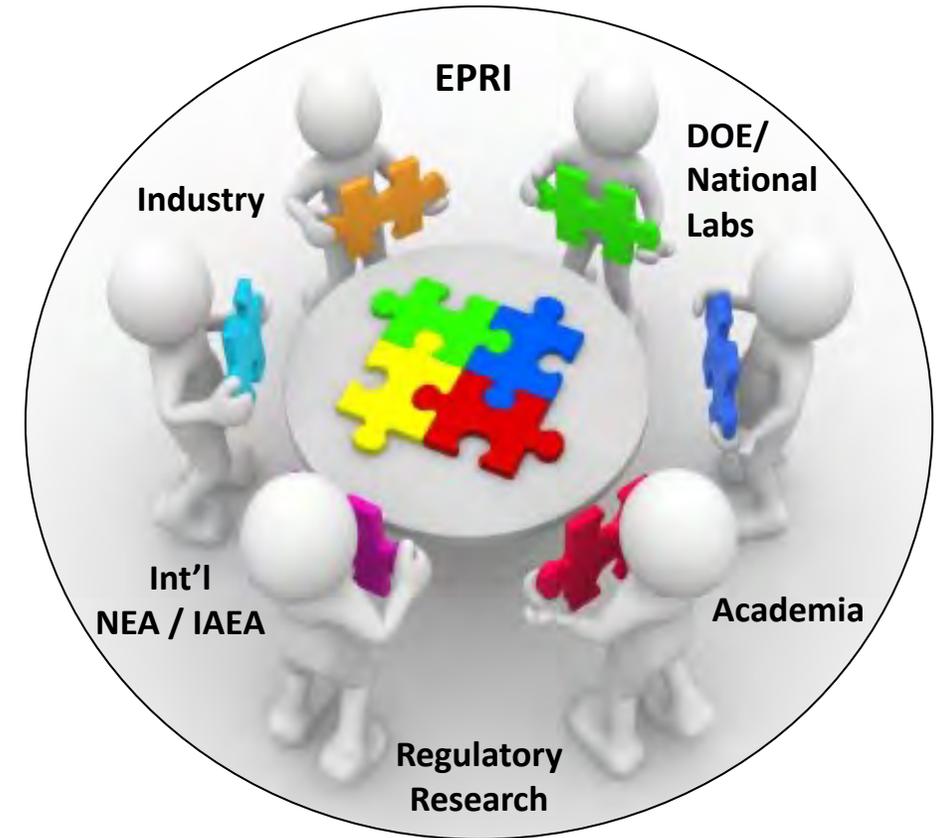
# CRAFT Mandate and Purpose

- Foster research cooperation and collaboration
  - Bring technical subject matter experts from all stakeholders together
  - Present deliverables to optimize R&D resources and accelerate timelines toward licensing submittals and regulatory reviews
- Emulate the Extended Storage Collaboration Program (ESCP) on dry storage issues



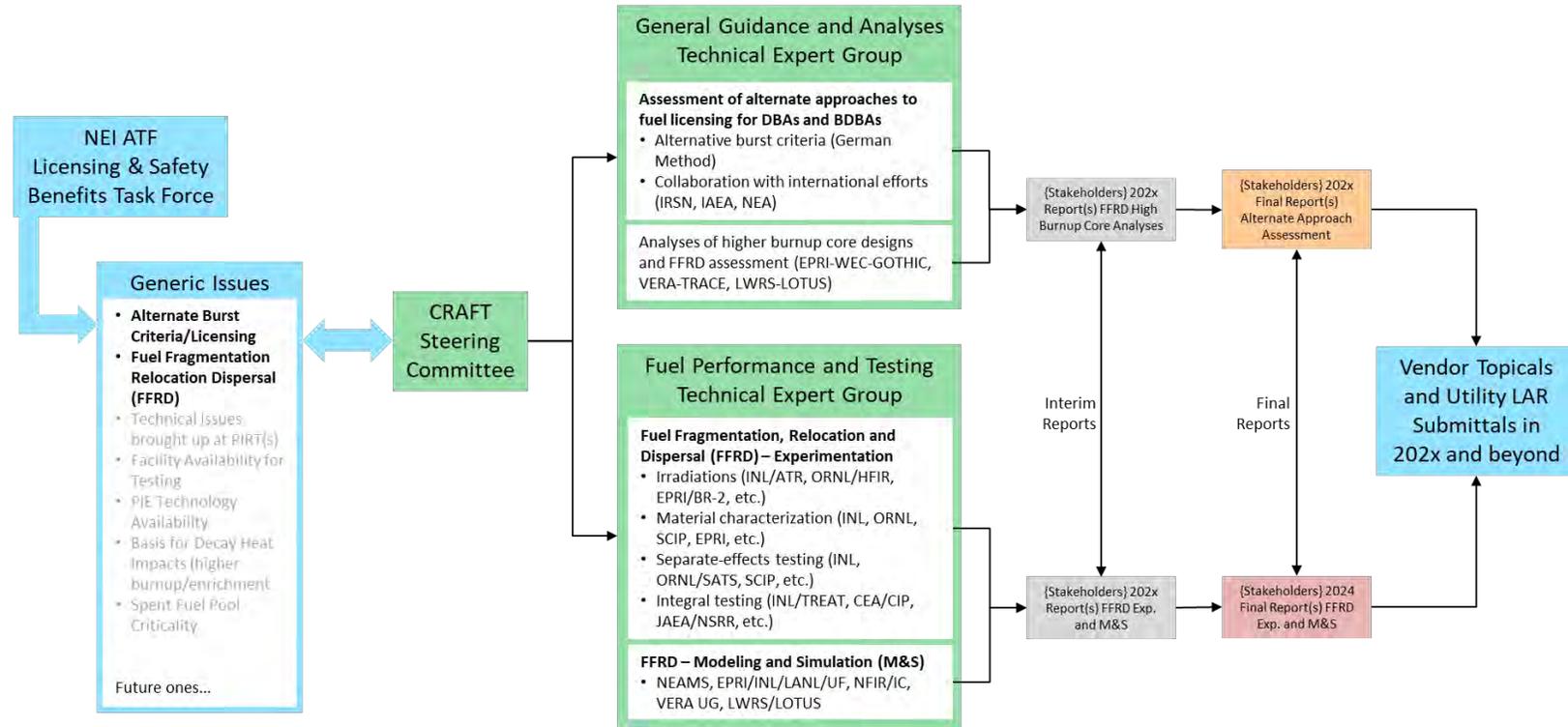
# Objectives

- 1. Bring together subject matter experts** from U.S. organizations, and when appropriate international organizations.
- 2. Identify both short and long-term technical options and recommendations** for supporting the highest priority RD&D needs.
- 3. Support gap analyses and/or Phenomena Identification and Ranking Table (PIRT) processes.**
- 4. Compile, analyze and synthesize generic RD&D results to form technical bases** in targeted deliverables.



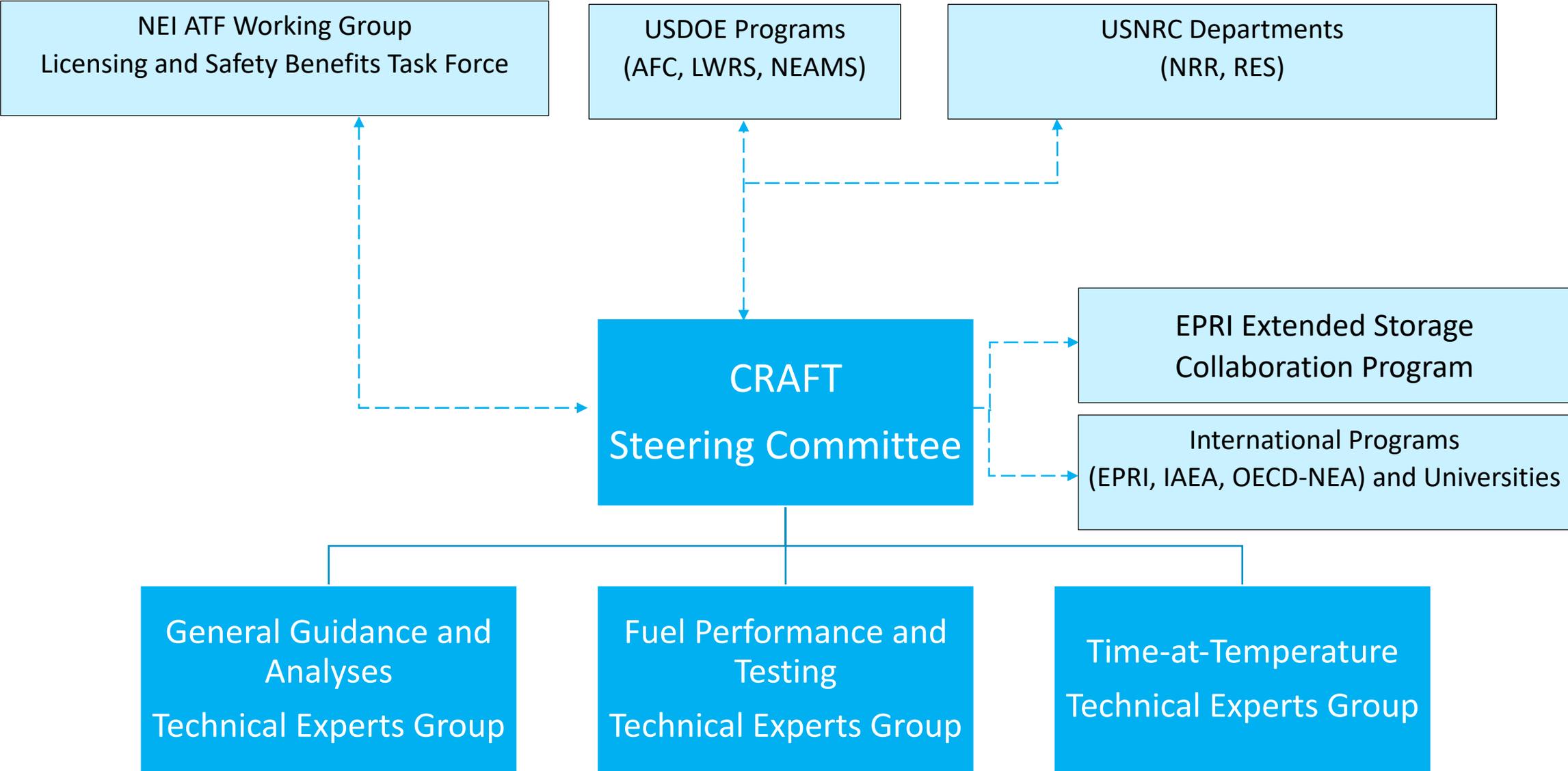
# CRAFT Technical Focus

- Initial focus of CRAFT to inform technical bases toward various licensing approaches and implications of **Fuel Fragmentation, Relocation and Dispersal (FFRD)** for higher burnup operations (~75 GWd/MTU)
- Stakeholders on CRAFT Steering Committee to discuss other issues that would benefit from the CRAFT framework



**Deliverables to Inform Industry, DOE, NRC and the Global Nuclear Community**

# CRAFT Structure and Key Stakeholder Interfaces



# CRAFT ITM – Research Evaluation Activities

## ▪ Fuel Fragmentation

- Higher burnup PIE
- Advanced fuel characterization and tests
- In- and out-pile testing
- Transient Fission Gas Release testing
- Modeling / Simulation
- Quantification of fuel susceptible to fragmentation

## ▪ Fuel Relocation

- Clad balloon propensity, size, and dynamics
- Effect of rod internal pressure and clad creep and associated thermal ramp conditions
- No rupture and rupture cases
- Quantification of fuel susceptible to relocation
- Acceptability and applicability of relocated fuel (core, ATF, non-ATF)

## ▪ Fuel Dispersal

- Experimental methodologies for quantifying fragment dispersal
- Quantification of fuel susceptible to dispersal
- Acceptability and applicability of dispersed fuel (core, ATF, non-ATF)
- Tracking of dispersed fuel
- Consequence analyses of dispersed fuel



Fuel Performance and Testing TEG

General Guidance and Analyses TEG

# Recent Developments

## Supported the development of DOE-AFC LOCA Testing Plan

- Combined integral and semi-integral LOCA test plan developed to address cross-cutting stakeholder needs and it leverages the best PIE capabilities in the country.
- Primary emphasis on experimental evaluation of identified R&D gaps in FFRD



# Recent Developments (cont.)

## **Technical Expert Panel Assessment of Existing Fuel Fragmentation, Relocation and Dispersal Data, EPRI 3002025542.**

- CRAFT is performing an official review of the published White Paper. Now, comments are being addressed in a revision.

## **Time at Temperature Criteria**

- Steering Committee agreed to form a Technical Expert Group to prepare a material testing plan.

# New TEG for Time-at-Temperature

## Time at Temperature Criteria

- Time at temperature material testing and fuel performance will be a CRAFT focus area for 2023.
- T/H aspects of TaT, including modeling and testing, are handled by respective fuel suppliers.
- Beneficial for potential power uprate projects as well as fuel cycle economy.
- A new TEG is formed to develop the material testing plan including identification of testing facility, defining the test protocol, and selection of materials.

# Summary

- CRAFT provides a forum for various stakeholders
- Focuses on issues that are relevant to
  - deployment of advanced LWR fuel technologies
  - improvements in plant safety, economic, and operational flexibility including for example power uprates and extended cycles
- It is aligned with industry needs and continues to provide valuable contributions

A blue-tinted photograph of four people, two men and two women, standing in a row. They are all wearing white lab coats or work shirts with the EPRI logo on the chest. The woman on the far right is wearing a white hard hat. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# EPRI Used Fuel and High-Level Waste Program Overview

Bob Hall  
May 18, 2023

## ACRS Meeting



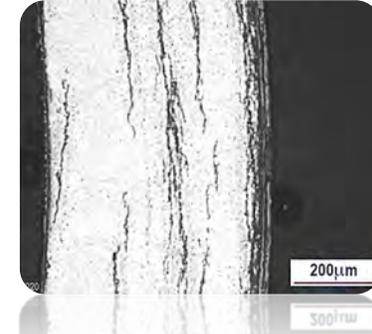
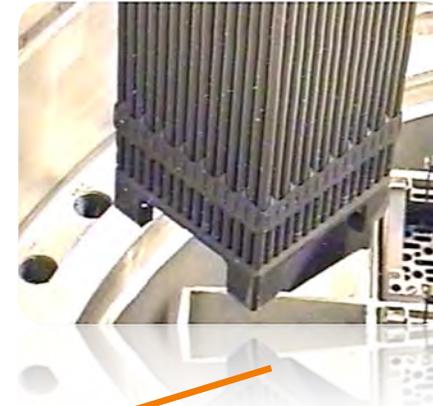
# UF&HLW Research Focus Areas

## Aging Management of Dry Storage Systems

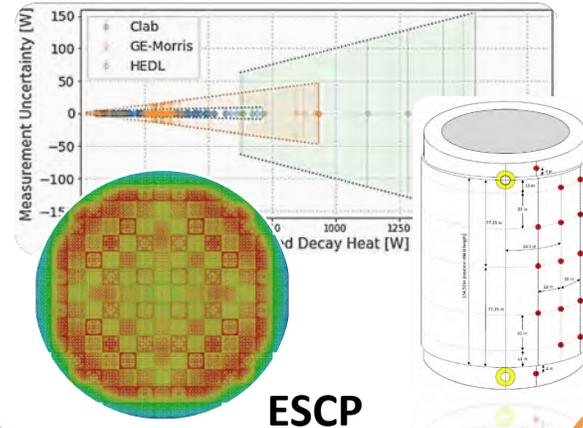


## Criticality

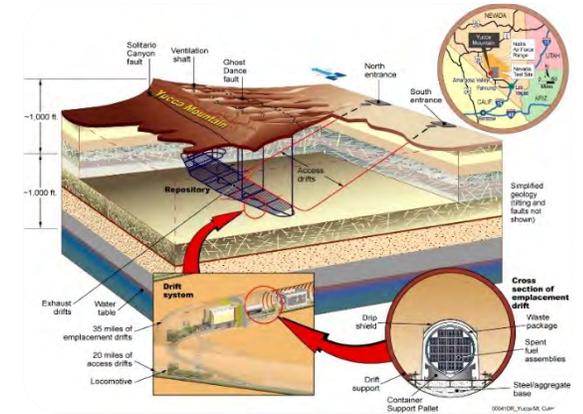
## Cladding Performance



## Cross-cutting



## Disposal



# UF&HLW 2023 Research Focus Area Projects

## Aging Management of Dry Fuel Storage Components

Dose Consequences /  
Internal Particle Deposition

Dry Storage System  
Mitigation & Repair

Canister NDE  
Demonstration and  
Support

Dry Transfer System  
Options

Bolted Cask Seal Leak  
Indication Response

## Used Fuel Cladding Performance During Storage & Transportation

High Burnup  
Demonstration

Alternate Fuel Performance  
Metric PIRT

HBU International Cladding  
Collaborations (NFIR, SCIP,  
IAEA SFERA)

Fuel Cladding Analysis

## Used Fuel Criticality Control During Storage & Transportation

ATF/HBU/HE SFP  
Criticality\*

i-LAMP: Global SFP NAM  
Monitoring

Neutron Absorber  
Materials / NAUG

Metamic Performance  
Evaluation

SFP NAM In-situ  
Measurement Tool

## Cross-Cutting Research

Extended Storage  
Collaboration Program\*

Decay Heat Measurements  
and Validation\*

DSS Dose Modeling

Canister Sensors

DOE Canister Testing

UNFSTANDARDS  
Enhancements

\*Covered in another presentation today



# i-LAMP

# i-LAMP: Industrywide Global Learning Aging Management Program

## Global program – Initial focus is on BORAL®

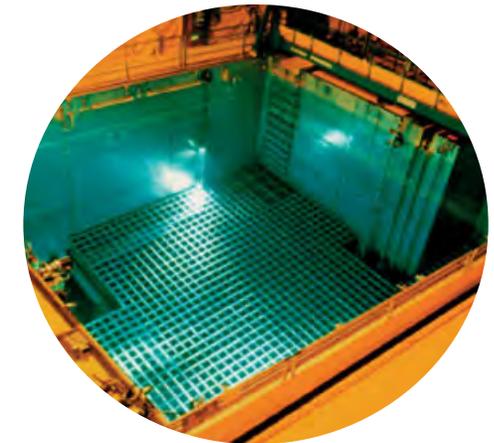
- NAM specifications (type, vintage)
- NAM history (installation and manufacturing years)
- SFP water chemistry history
- NAM performance (coupon monitoring)

## Sibling Pool Process – If No Coupons

- Identify sibling(s)
- Commitment to i-LAMP for AMP
- Periodic data updates (“learning”)
- Periodic sibling performance update



SFP With Coupons



SFP Without Coupons

EPRI report, 3002018497, that summarizes i-LAMP is published and i-LAMP is currently under NRC review as part of NEI 16-03 Revision 1.



# PIRT Activities

# Phenomena Identification and Ranking Table (PIRT) Activities

## Fuel

- Published in EPRI report, 3002018439, in 2020
- Led to the Gross Rupture PIRT,
  - New definition of GR that is more actionable
  - Published in EPRI report 3002020929
- Alternate Fuel metric PIRT is being finalized
  - Report will be published in August 2023
- Next steps, for regulatory review/implementation, are being discussed

## Thermal Modeling

- Published in EPRI report, 3002018441, in 2020
- Need for evaluation of
  - Code-to-code variations
  - User-to-user variations
- Led to the international thermal benchmark project

## Decay Heat

- Published in EPRI report, 3002018440, in 2020
- Identified gaps
  - Lack of measurement data for high burnup and short cooling times
- Recommended publication of “unpublished” Clab decay heat measurements
  - Due to high quality of measurements
- Led to SKB-EPRI joint project

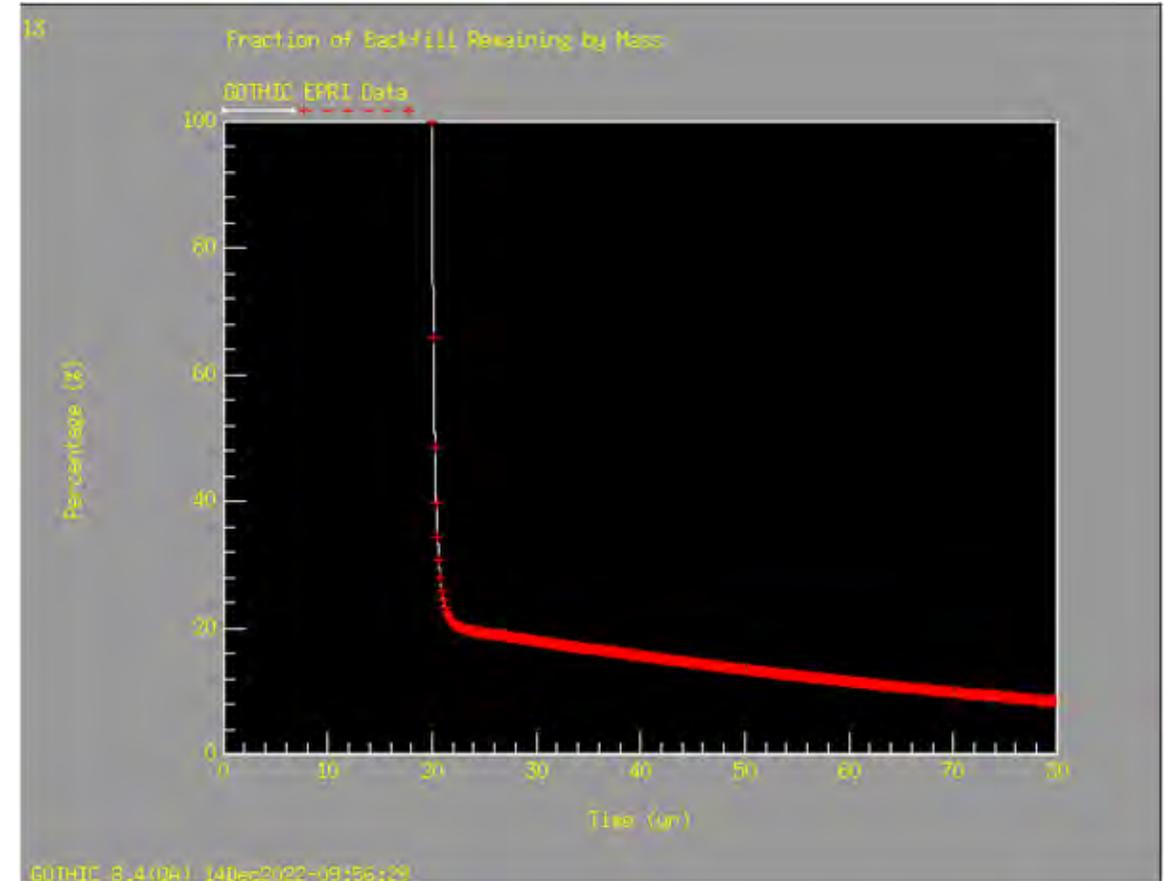
**Experts from many organizations (DOE Labs, NRC, vendors, utilities) participated in PIRTs**  
**Reports are publicly available from [epri.com](https://www.epri.com)**



# Used Fuel Canister Consequence Modeling

# GOTHIC Benchmarking Against Canister CISCC Canister-to-Environment Flow Rate

- Initial investigation of GOTHIC capability
  - Comparison to EPRI 3002015062 results.
- Modeled characteristics
  - Canister internal free volume, backfill gas, crack characteristics (size, roughness, tortuosity, etc.)
  - 19.5 Kw initial decay heat, gas temperature a function of decay heat (t), external temperature
- Not modeled
  - Internal geometry details
  - Particulates
  - Detailed heat transfer, convective flow
- Results match closely with EPRI 3002015062.
- Technical report, *GOTHIC 8.4 Benchmarking Against Canister CISCC Flow Rate*, published April 2023



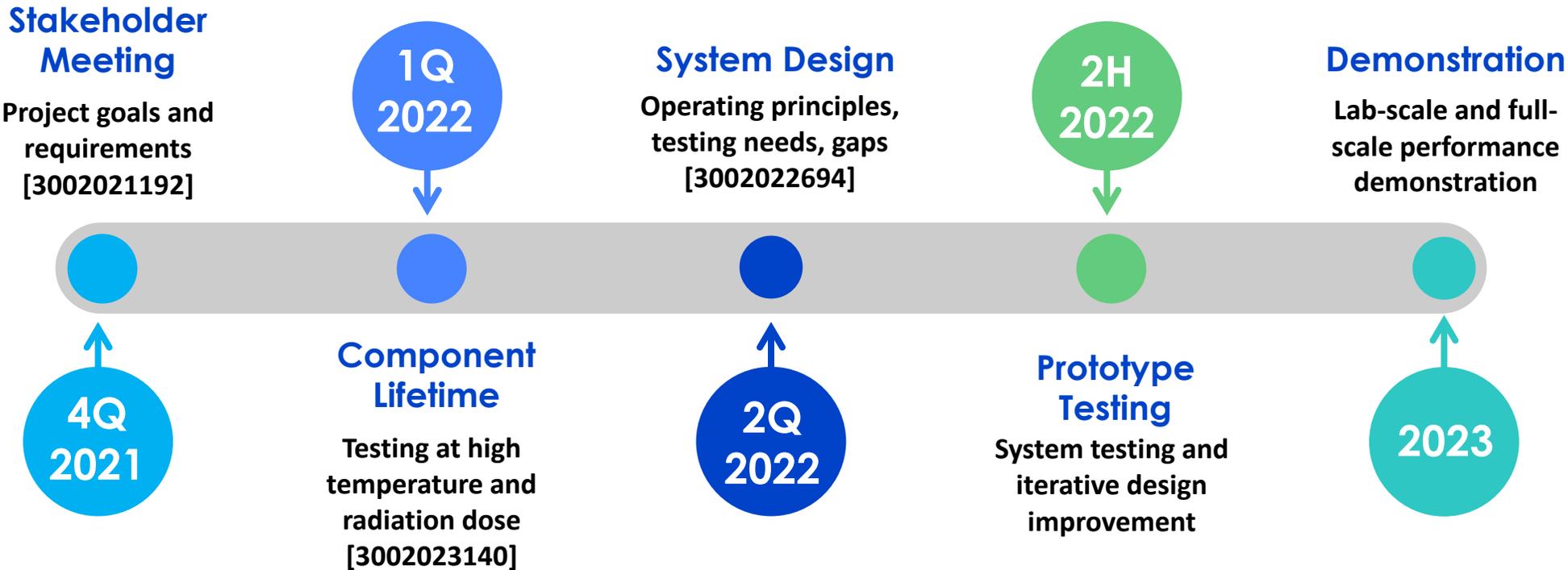


# Wireless Internal Canister Sensors Update

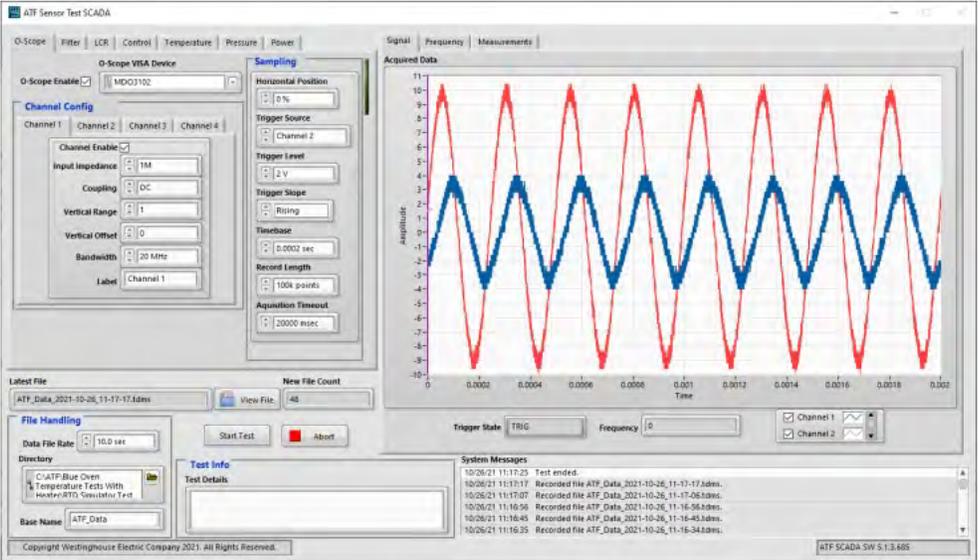
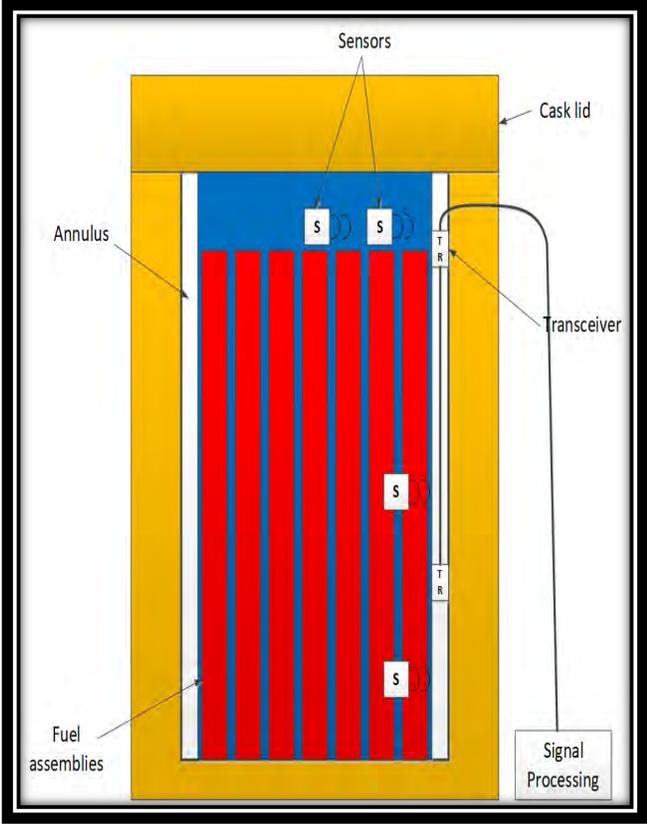
# Cross-Cutting: Canister Internal Sensors

## Goals:

- No wires, internal power, or penetrations
- Measure temperature and pressure
- Direct confirmation of thermal margin
- Direct confirmation of canister pressure



# Cross-Cutting: Canister Internal Sensors



Pictures Courtesy of Westinghouse Electric Company LLC

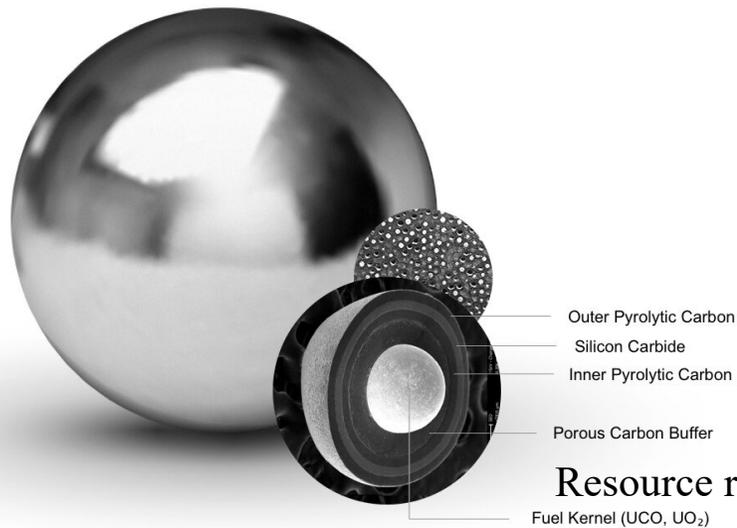


# Advanced Reactors and Used Fuel Recycling

# Used Fuel Reprocessing in an Advanced Reactor Era

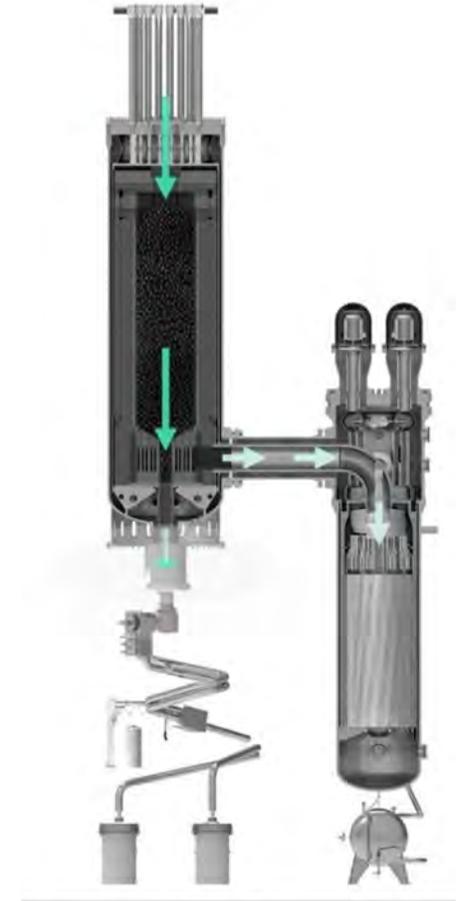
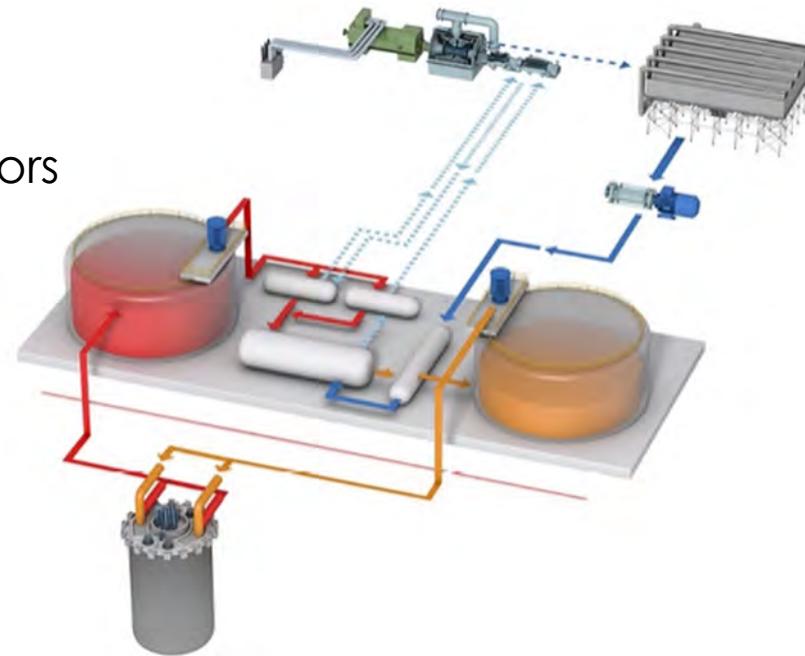
## Concise summary and options

- Fuel recycling history
- Technology readiness
- Cost estimates
- Resource requirements
- Recycle and waste products
- Integration with advanced reactors



Resource requirements

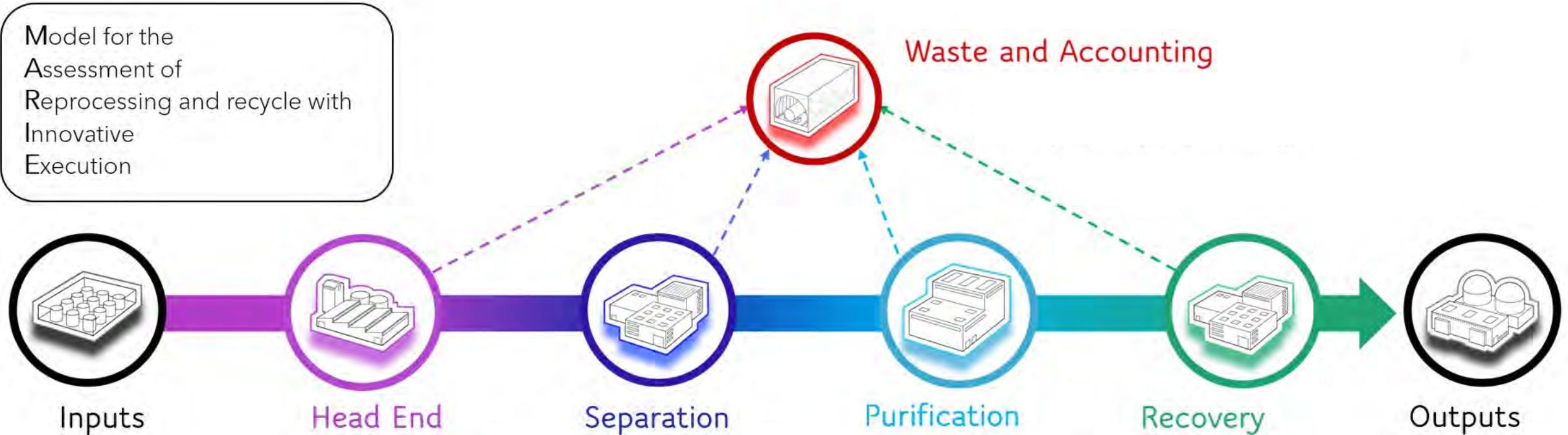
Fuel Kernel (UCO, UO<sub>2</sub>)



Are there reactor/recycle combinations that make sense?

# Converting UNF Radioisotopes into Energy (ARPA-E CURIE)

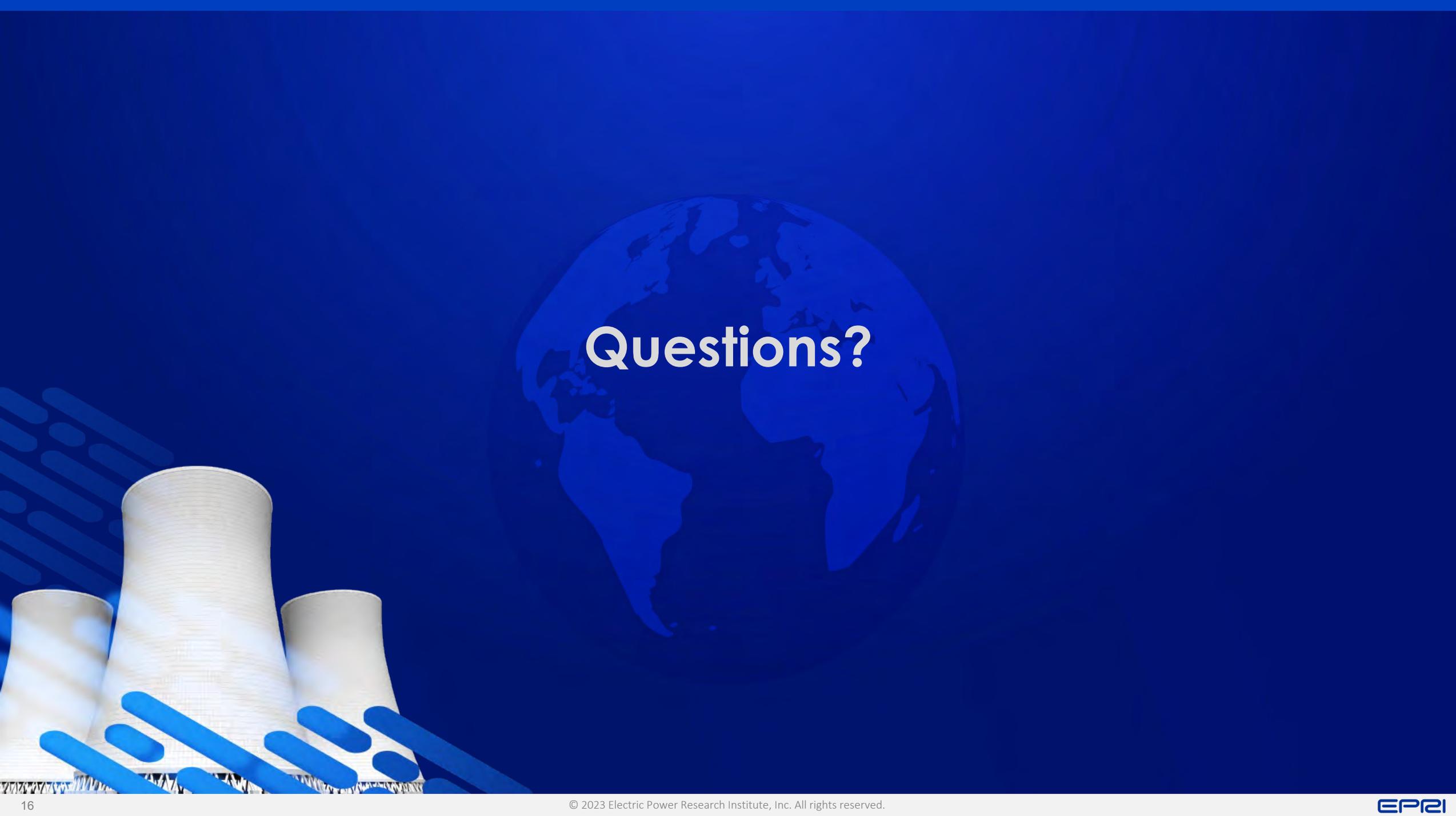
Project MARIE, Selected by ARPA-E



<b>Developing</b>	Flowsheet Optimization Tool
	Preconceptual Reprocessing Facility Design Technology Commercialization Plan

<b>Partners</b>	Southern Company
	Deep Isolation Oak Ridge National Lab

Maturing historic and evolving technologies for economic recycling



Questions?

A blue-tinted photograph of four people standing in a row. From left to right: a woman with curly hair and glasses wearing a white lab coat with 'EPRI' on the pocket; a man with glasses wearing a white lab coat with 'EPRI' on the pocket; a woman wearing a white hard hat and a dark polo shirt with 'EPRI' on the pocket; and a man with glasses and a beard wearing a light blue button-down shirt. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# 2022-2023 UFHLW Papers and Publications

1. [IHLRWM2022] Hatice Akkurt, “*i-LAMP: Industrywide Learning Aging Management Program for Global Monitoring of Spent Fuel Pools*,” published in Proceedings of International High Level Radioactive Waste Management (IHLRWM 2022) Conference, November 2022. [Presented by Akkurt at IHLRWM 2022 conference].
2. [IHLRWM2022] Hatice Akkurt and Robert Hall, “*Recent Advancements in SFP Criticality for Existing LWR Fuels and Roadmap for Advanced LWR Fuels*,” published in Proceedings of International High Level Radioactive Waste Management (IHLRWM 2022) Conference, November 2022. [Presented by Akkurt at IHLRWM 2022 conference].
3. [IHLRWM2022] Henrik Liljenfeldt, Hatice Akkurt, Robert Hall, Fredrik Johansson, Jesper Kierkegaard, “*Decay Heat Measurements and Analysis for BWR Fuel with Shorter Cooling Time*,” published in Proceedings of International High Level Radioactive Waste Management (IHLRWM 2022) Conference, November 2022. [Presented by Akkurt at IHLRWM 2022 conference].
4. [IHLRWM2022] Amanda Jenks and Hatice Akkurt, “*Handbook of Neutron Absorber Materials for Spent Nuclear Fuel Storage and Transportation Applications*,” published in Proceedings of International High Level Radioactive Waste Management (IHLRWM 2022) Conference, November 2022. [Presented by Akkurt at IHLRWM 2022 conference].
5. [IHLRWM2022] R. Ferrer, J. Hykes, H. Akkurt, R. Hall, “*Extension of EPRI Benchmarks to Advanced LWR Fuels for SFP Criticality Depletion Uncertainty*,” published in Proceedings of International High level Radioactive Waste Management Conference, November 2022. [Presented by Ferrer-Studsvik at IHLRWM 2022 conference].

# 2022-2023 UFHLW Papers and Publications

6. [Global2022] Fredrik Johansson, Jesper Kierkegaard, Henrik Liljenfeldt, **Robert Hall**, **Hatice Akkurt**, “*Extending the Validation Range for Decay Heat Measurements*,” published in Proceedings of Global 2022 conference, Reims, France, July 6-8, 2022. [Presented by Fredrik Johansson (SKB) at Global conference].
7. [Nuclear Technology Journal] **Hatice Akkurt**, “*Evaluation of Boron Panels from an Operating Spent Fuel Pool*,” under review - Nuclear Technology journal.
8. [PATRAM2023] **Hatice Akkurt**, Fredrik Johansson, Henrik Liljenfeldt, Amela Mehic, Jesper Kierkegaard, **Robert Hall**, “*Decay Heat Evaluation for Extended Range Using Clad Measurements*,” abstract submitted to PATRAM 2023 conference, June 2023, France.
9. [PATRAM2023] **Keith Waldrop**, “*Transport License Approach to Maintain Thermocouples in High Burnup Research Project Cask*,” abstract submitted to PATRAM 2023 conference, June 2023, France.
10. [M&C 2023] Rodolfo Ferrer, Joshua Hykes, **Hatice Akkurt**, **Robert Hall**, “*Extension of Reactivity Decrement Uncertainty to Advanced LWR Fuels via Stochastic Sampling and Sensitivity-Based Verification*,” extended summary submitted to the M&C 2023 - The International Conference on Mathematics and Computational Methods, August 2023, Ontario, Canada.

# 2022-2023 UFHLW Papers and Publications

11. [EPRI Journal] *“A Collective Approach to Safe Used Nuclear Fuel Storage,”* EPRI Journal, March 2022. [H. Akkurt and B. Hall contributors - article highlights EPRI Extended Storage Collaboration Program (ESCP)]
12. [OECD/NEA] Hatice Akkurt, *“Technical Challenges, Solutions and Opportunities for Collaboration for Managing Extended Storage for LWR,”* invited speaker at NEA's 55th Plenary Meeting of the Radioactive Waste Management Conference (RWMC), March 2022 - Virtual presentation.
13. [OECD/NEA] Hatice Akkurt, *“EPRI-SKB Collaboration on Decay Heat Measurements and Validation,”* invited speaker at OECD/NEA's Working Group on Decay Heat (WG12), June 22, 2022 - Virtual presentation.
14. [ESCP] H. Akkurt and B. Hall, *“Extending Validation Range for Decay Heat and Re-assessment of Uncertainties in Measurements,”* EPRI ESCP Winter 2022 meeting, November 2022, Charlotte, NC.
15. [ESCP] K. Waldrop, *“Alternate Fuel Performance Metrics Phenomena Identification and Ranking Tables (PIRT),”* EPRI ESCP Winter 2022 meeting, November 2022, Charlotte, NC.
16. [ESCP] Shannon Chu, *“EPRI Mitigation & Repair Activities,”* EPRI ESCP Winter 2022 meeting, November 2022, Charlotte, NC.

# SFP Criticality for LEU+: Depletion Uncertainty and Criticality Code Validation

Hatice Akkurt and Bob Hall  
Used Fuel and High-Level Waste Program

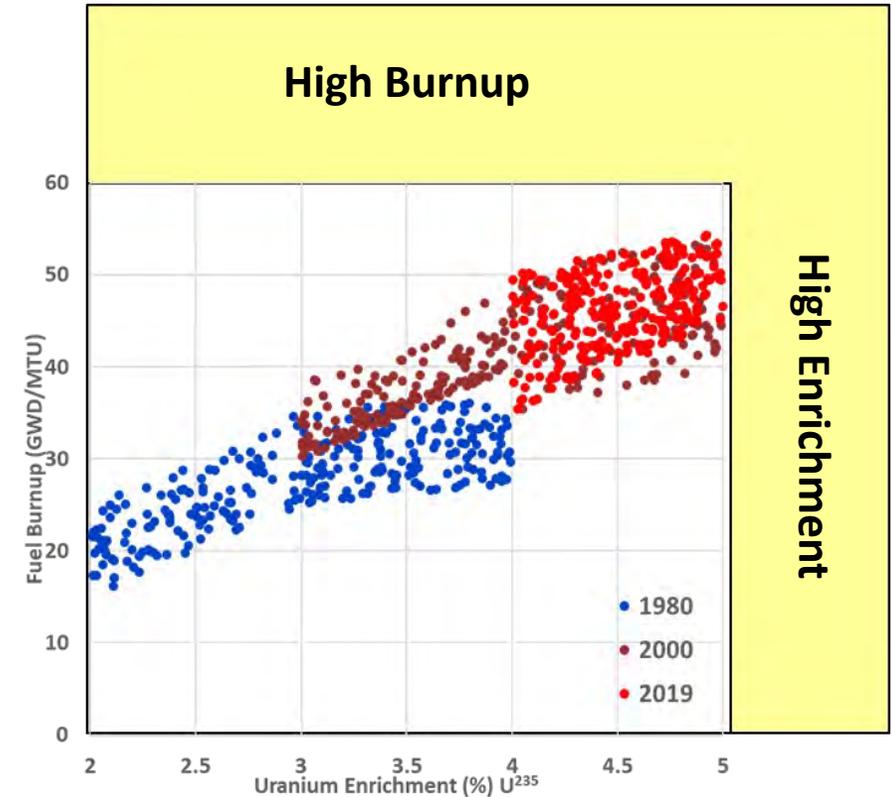
May 18, 2023

## ACRS Meeting



# SFP Criticality for Advanced Fuels (LEU+)

- EPRI formed SFP Criticality for Advanced Fuels Working Group
  - Composed of representatives from
    - Utilities (Exelon, Southern, Entergy, Duke, Dominion, TVA)
    - Vendors (Westinghouse, GE, Framatome, Studsvik, and Holtec)
    - NEI
  - Conducted working groups meetings
    - **Identified gaps, issues that needs to be addressed**
    - Categorized by leading organization (EPRI, utility, vendor)
  - **Generic issues** (to be led by EPRI)
    1. **Criticality code validation**
    2. **Depletion (burnup credit) uncertainty and bias**
  - Vendor and utility specific issues/gaps identified



**LEU+ requires technical bases for SFP, New Fuel Vault criticality safety analyses.  
Current guidance (RG 1.240) extends to 5% enrichment and 60 GWd/MTU burnup.**



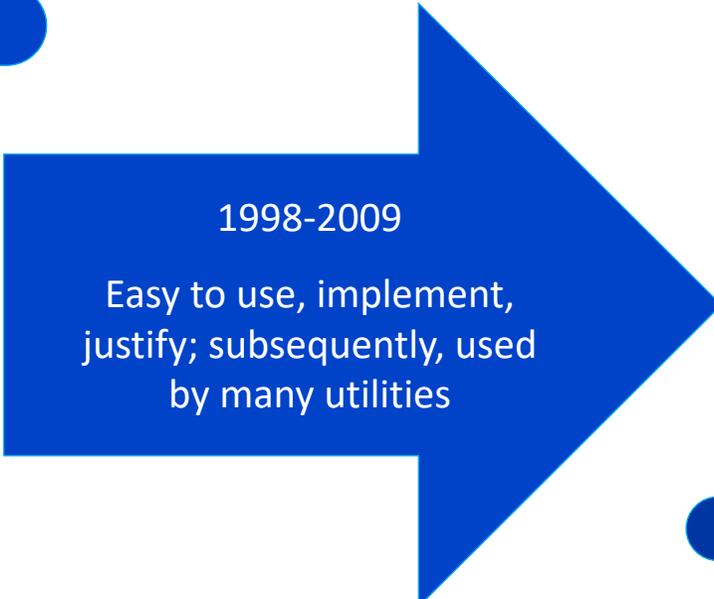
# Depletion Uncertainty and Bias

# Background: Spent Fuel Pool (SFP) Criticality and Depletion Uncertainty and Bias\*

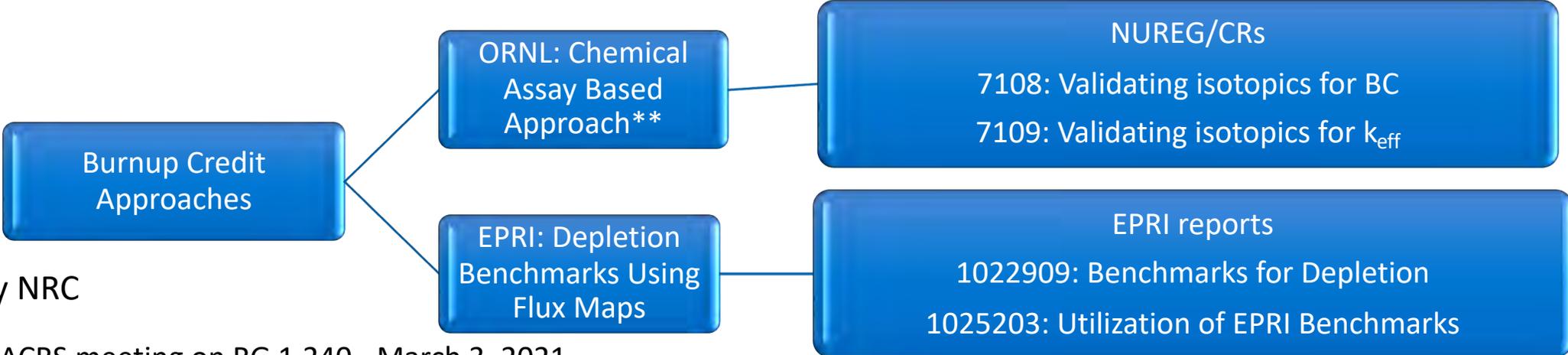
- No critical experiments using spent fuel
- Critical experiments are very expensive
- Using fresh fuel assumption for spent fuel causes loss of SFP storage space
- How to account for uncertainty and bias for spent fuel?

## 1998 Kopp Memo:

*“In the absence of any other determination of the depletion uncertainty, an uncertainty equal to 5 percent of the reactivity decrement to the burnup of interest is an acceptable assumption.”*



NRC: What is the technical justification or where is the documentation for 5% decrement?



\*Funded by NRC

\*Slide from ACRS meeting on RG 1.240 - March 3, 2021

# Background: EPRI Benchmarks\*

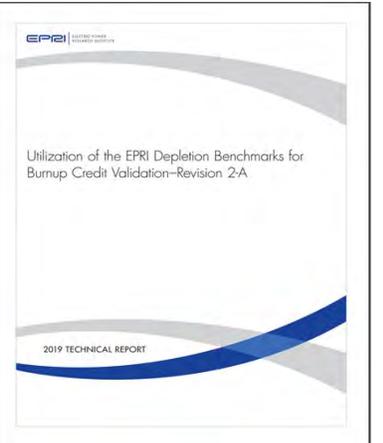
Received final SER on July 26, 2019



3002016888, Utilization of the EPRI Depletion Benchmarks for Burnup Credit Validation - Revision 2, published August 29, 2019

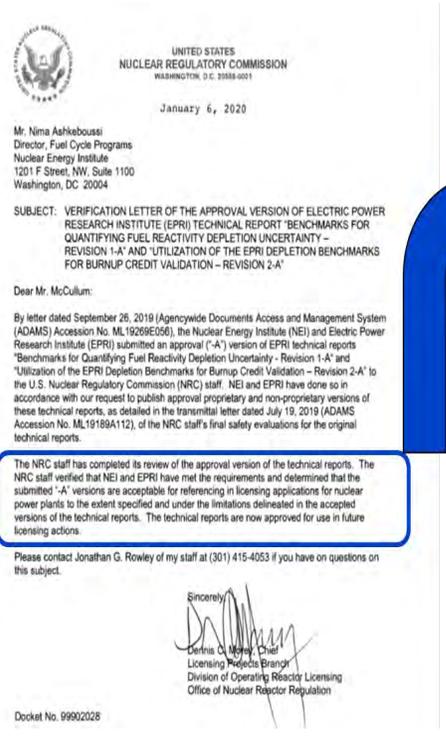


3002016035, Benchmarks for Quantifying Fuel Reactivity Depletion Uncertainty- Revision 1-A, published September 18, 2019



3002017254, Utilization of the EPRI Depletion Benchmarks for Burnup Credit Validation - Revision 2-A, published September 18, 2019

Burnup (GWd/MTU)	EPRI Uncertainty (%)	Additional NRC Bias (%)
10	3.05	0.0
20	2.66	0.0
30	2.33	0.0
40	2.12	0.15
50	1.95	0.35
60	1.81	0.54



The NRC staff has completed its review of the approval version of the technical reports. The NRC staff verified that NEI and EPRI have met the requirements and determined that the submitted "-A" versions are acceptable for referencing in licensing applications for nuclear power plants to the extent specified and under the limitations delineated in the accepted versions of the technical reports.

**The technical reports are now approved for use in future licensing actions.**

Received final approval letter on January 6, 2020

EPRI benchmarks showed that Kopp memo (5%) is conservative and provided technical justification for additional margins

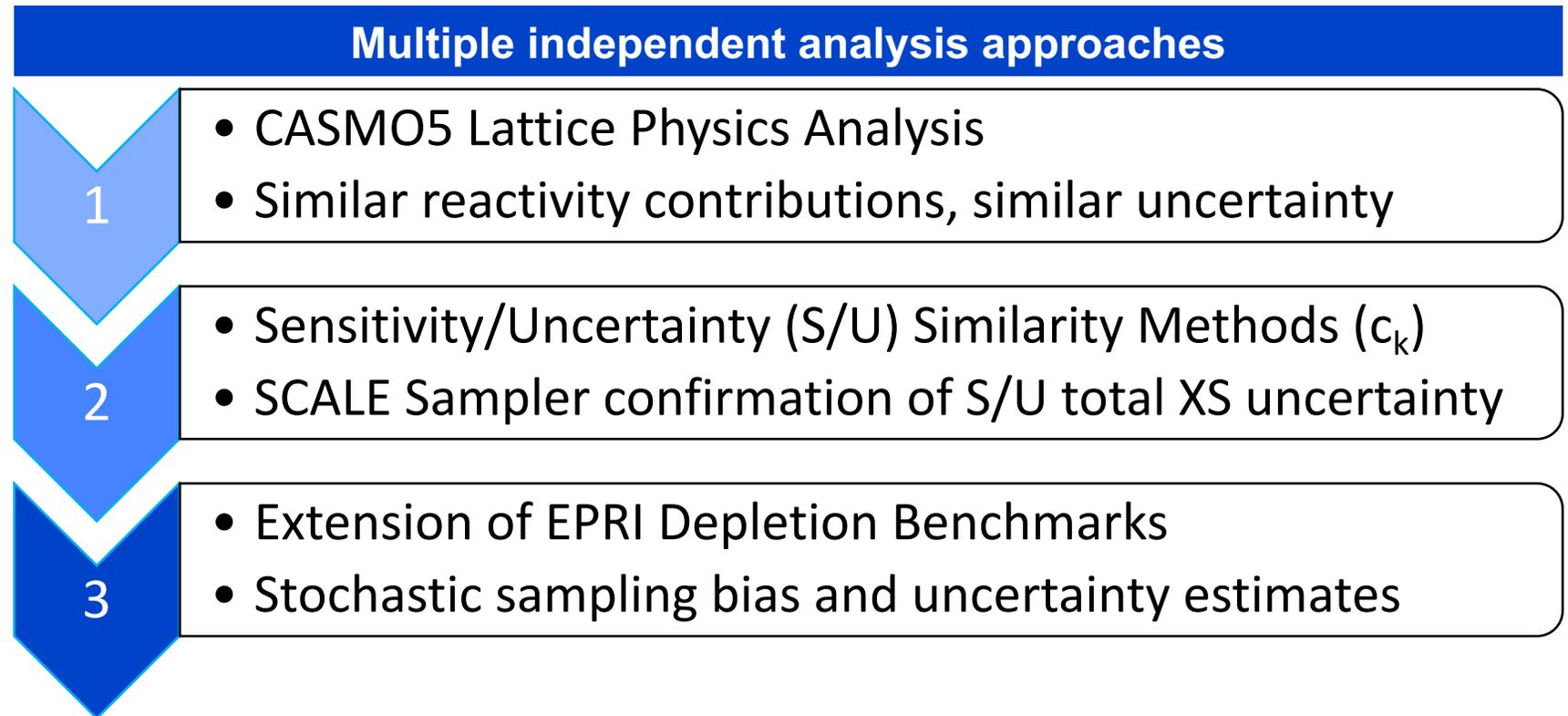
\*Slide from ACRS meeting on RG 1.240 - March 3, 2021

# Burnup Credit Uncertainty and Bias for LEU+ SFP Criticality

**1<sup>st</sup> Question:** Is the Kopp memo depletion uncertainty (5%) sufficient for ATF/HE/HBU?

**2<sup>nd</sup> Question:** Can regulator-approved EPRI benchmarks be extended for ATF/HE/HBU?

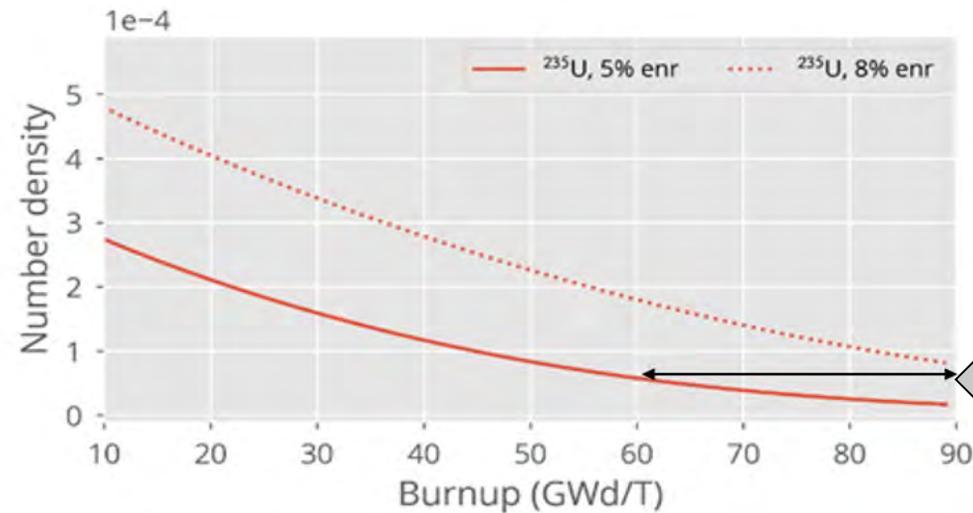
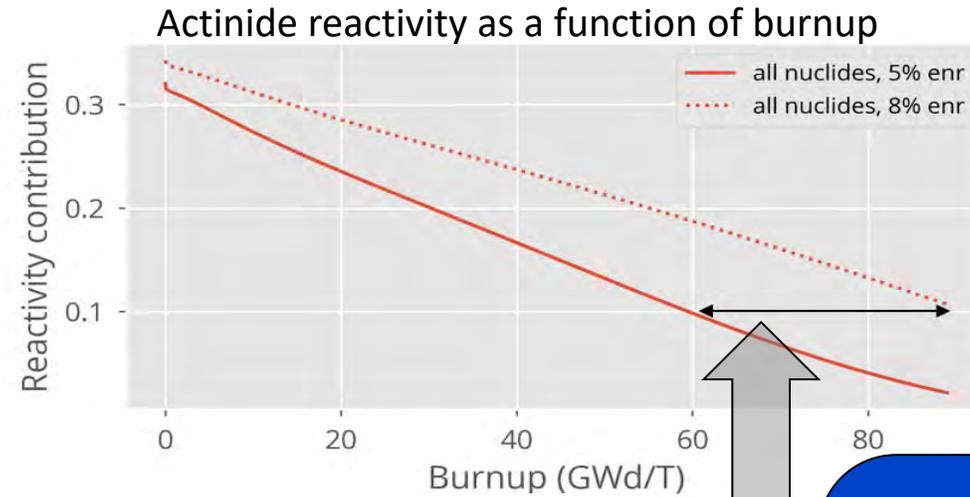
Burnup (GWd/MTU)	Uncertainty (%)	Bias (%)
10	3.05	0.0
20	2.66	0.0
30	2.33	0.0
40	2.12	0.15
50	1.95	0.35
60	1.81	0.54



**If analysis supports, simple use of 5% uncertainty without additional experimental data, no added conservatism**

# Comparison of Actinide Production and Depletion

Nuclide	Number Density (8% vs 5%)	Reactivity (8% vs 5%)
U-235	Higher	Higher
U-238	Lower	Lower
Pu-238	Similar	Similar
Pu-239	Higher	Lower
Pu-240	Lower	Lower
Pu-241	Lower/Higher	Lower
Am-241	Lower/Higher	Lower/Similar
Am-242	Small	Small
Am-242m	Small	Small
Am-243	Lower	Lower
Cm-242	Lower/Similar	Small
Cm-244	Lower	Lower



U-235 number density as a function of burnup

5%, 60 GWd/T  
and  
8%, 90 GWd/T  
are very similar

Of the actinides, only U-235 is more important for LEU+, accuracy of U-235 is well known

# SCALE/Tsunami Sensitivity/Uncertainty

- Similarity coefficient  $c_k$ 
  - $c_k = 1$ , same neutronic sensitivity and uncertainty
  - $c_k = 0$ , not neutronically similar
  - Typical values range from 0.8 to 0.9 for “similar”

**NUREG-2216:** In recent years, some analytical tools have been developed that *may be useful for identifying applicable benchmark experiments* and evaluating the quality of the experiments. These tools include *SCALE’s TSUNAMI tools, which use sensitivity and uncertainty techniques to provide a quantitative measure of the overall similarity* of an experiment to the analyzed package...

**ISG-10 Rev. 1:** The NRC staff currently considers *a correlation coefficient of  $ck \geq 0.95$  to be indicative of a very high degree of similarity*. This is based on the staff’s experience comparing the results from TSUNAMI to those from a more traditional screening criterion approach. Conversely, *a correlation coefficient less than 0.90 should not be used as a demonstration of a high degree of benchmark similarity. Because of limited use of the code to date, these observations should be considered tentative and thus the reviewer should not use TSUNAMI as a “black box,” or base conclusions of adequacy solely on its use.* However, it may be used to test a licensee’s statement that there is a high degree of similarity between experiments and applications.

# Similarity Analysis Using Tsunami

Similarity coefficient  $c_k$

- $c_k = 1$ , same neutronic sensitivity and uncertainty
- $c_k = 0$ , not neutronically similar

5%

0 hfp	-	99
czp	0h	97
czp	100h	97
czp	5y	97
czp	15y	98

CZP with 100 hours cooling

5%

Bu	0	0.5	10	20	30	40	50	60	70	80	90
0	0.99	0.99	0.95	0.87	0.77	0.66	0.54	0.45	0.36	0.3	0.25
0.5	0.99	0.99	0.95	0.87	0.78	0.67	0.56	0.46	0.37	0.31	0.26
10	0.98	0.98	0.98	0.94	0.86	0.76	0.66	0.57	0.49	0.42	0.37
20	0.95	0.96	0.99	0.97	0.92	0.84	0.75	0.67	0.59	0.53	0.48
30	0.91	0.92	0.98	0.99	0.96	0.9	0.83	0.75	0.68	0.62	0.58
40	0.85	0.86	0.95	0.99	0.98	0.95	0.9	0.83	0.77	0.72	0.67
50	0.78	0.79	0.9	0.97	0.99	0.98	0.94	0.89	0.84	0.8	0.76
60	0.71	0.72	0.85	0.93	0.98	0.99	0.97	0.94	0.9	0.86	0.83
70	0.62	0.64	0.78	0.89	0.95	0.98	0.99	0.97	0.94	0.91	0.88
80	0.54	0.56	0.71	0.83	0.92	0.97	0.99	0.99	0.97	0.95	0.93
90	0.47	0.48	0.64	0.77	0.87	0.94	0.98	0.99	0.98	0.97	0.96

8%

8%

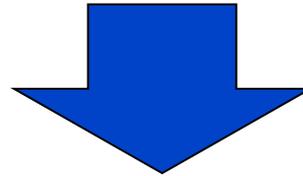
5% 60 Gwd and 8% 90Gwd →  $c_k = 0.99$  (highly similar)

Tsunami and physics results are in agreement – no increase in uncertainty for LEU+

# EPRI Depletion Benchmark Extension

- Bias and Uncertainty from previous work, approved by the regulator, based on measured flux map data

Burnup (GWd/MTU)	10	20	30	40	50	60
Bias (% of depletion reactivity)	0.30	0.34	0.36	0.38	0.40	0.41
Uncertainty (% of depletion reactivity)	3.05	2.66	2.33	2.12	1.95	1.81



- Bias and Uncertainty from current work, using stochastic sampling, as confirmatory analysis for 5% enrichment

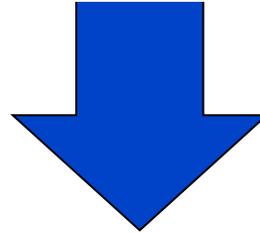
Burnup (GWd/MTU)	10	20	30	40	50	60
Bias (% of depletion reactivity)	0.55	0.58	0.58	0.54	0.50	0.45
Uncertainty (% of depletion reactivity)	3.2	2.6	2.5	2.4	2.2	2.0

**Good agreement between bias and uncertainty derived from stochastic sampling approach and measured data – stochastic sampling method confirmed to be conservative**

# EPRI Depletion Benchmark Extension

- Bias and Uncertainty from current work for **5%** enrichment – Based on stochastic sampling

Burnup (GWd/MTU)	10	20	30	40	50	60
Bias (% of depletion reactivity)	0.55	0.58	0.58	0.54	0.50	0.45
Uncertainty (% of depletion reactivity)	3.2	2.6	2.5	2.4	2.2	2.0



- Bias and Uncertainty from current work for **8%** enrichment

Burnup (GWd/MTU)	10	20	30	40	50	60	70	80	90
Bias (% of depletion reactivity)	0.64	0.62	0.62	0.62	0.61	0.59	0.57	0.56	0.54
Uncertainty (% of depletion reactivity)	3.7	3.0	2.8	2.7	2.6	2.6	2.5	2.4	2.3

**Depletion uncertainty is smaller than 5% of reactivity decrement (Kopp) for higher enrichment and burnup**

# Burnup Credit Uncertainty and Bias for LEU+ SFP Criticality

1<sup>st</sup> Question: Is the Kopp memo depletion uncertainty (5%) sufficient? -- **YES**

2<sup>nd</sup> Question: Can regulator-approved EPRI benchmarks be extended for LEU+? -- **YES**

## Multiple independent analysis approaches

1

- CASMO5 Lattice Physics Analysis
- Similar reactivity contributions, similar uncertainty

2

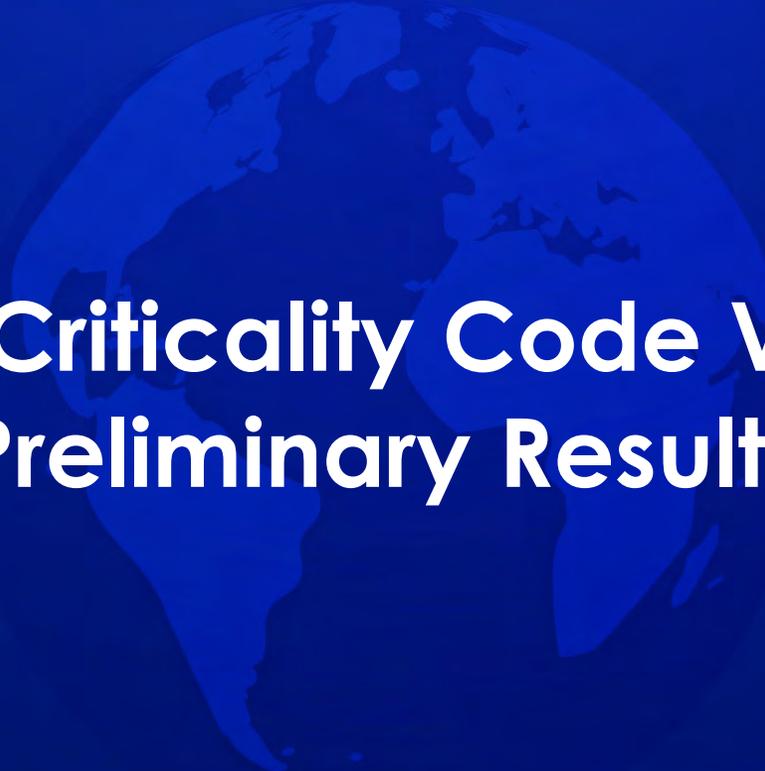
- Sensitivity/Uncertainty (S/U) Similarity Methods ( $c_k$ )
- SCALE Sampler confirmation of S/U total XS uncertainty

3

- Extension of EPRI Depletion Benchmarks
- Stochastic sampling bias and uncertainty estimates

EPRI report that describes the approaches and results for depletion uncertainty will be published in late 2023. Report will be publicly available.

**Multiple independent approaches support the conclusions**



# LEU+ SFP Criticality Code Validation Preliminary Results

# LEU+ Criticality Code Validation

## Research Questions:

- Are there sufficient critical benchmark experiments for the 5-8% enrichment range?
- Are they needed?

## Analysis Approach:

Survey available benchmark experiments using NUREG/CR-6698 guidance

Perform fresh fuel similarity analysis using TSUNAMI

- Use of TSUNAMI similarity/uncertainty (S/U) tools is an NRC recognized approach (NUREG-2216, Draft FCSS-ISG-10 Rev. 1)
- SFP and New Fuel Vault (NFV) Models
- Multiple PWR and BWR assembly types, rack types, neutron absorber loading, soluble boron, storage configurations, ATF features
- Compare 5 wt% storage to 6%, 7% and 8% storage
- If  $c_k > 0.9$ , neutronicallly similar, validation for 5 wt% is adequate



# Survey of Benchmark Experiments

# Critical Benchmark Selection Methods: NUREG/CR-6698

## Examples of Table 2.3 Parameters

Characteristic	Explanation / Guidance / This Analysis
Fuel fissionable material	Same fissionable material as the application ( <sup>235</sup> U)
Fuel isotopic Composition	Values close to range of application (Enrichment within ~2% of SFP cases)
Fuel physical form	UO <sub>2</sub> , pellets/pins
Moderator in the fuel	Water in the fuel lattice
Moderator form	Liquid water
Moderator density	Liquid water
Moderator ratio to fissile material	Within 20% of application range H/U similar to fuel assembly (pin pitch, pin OD, etc.)
Geometry	As close as possible to actual case, not as important as materials (Fuel pins in water, etc.)
Neutron energy	Similar energy range LCT – LEU-COMPOUND-THERMAL, or EALF (eV)

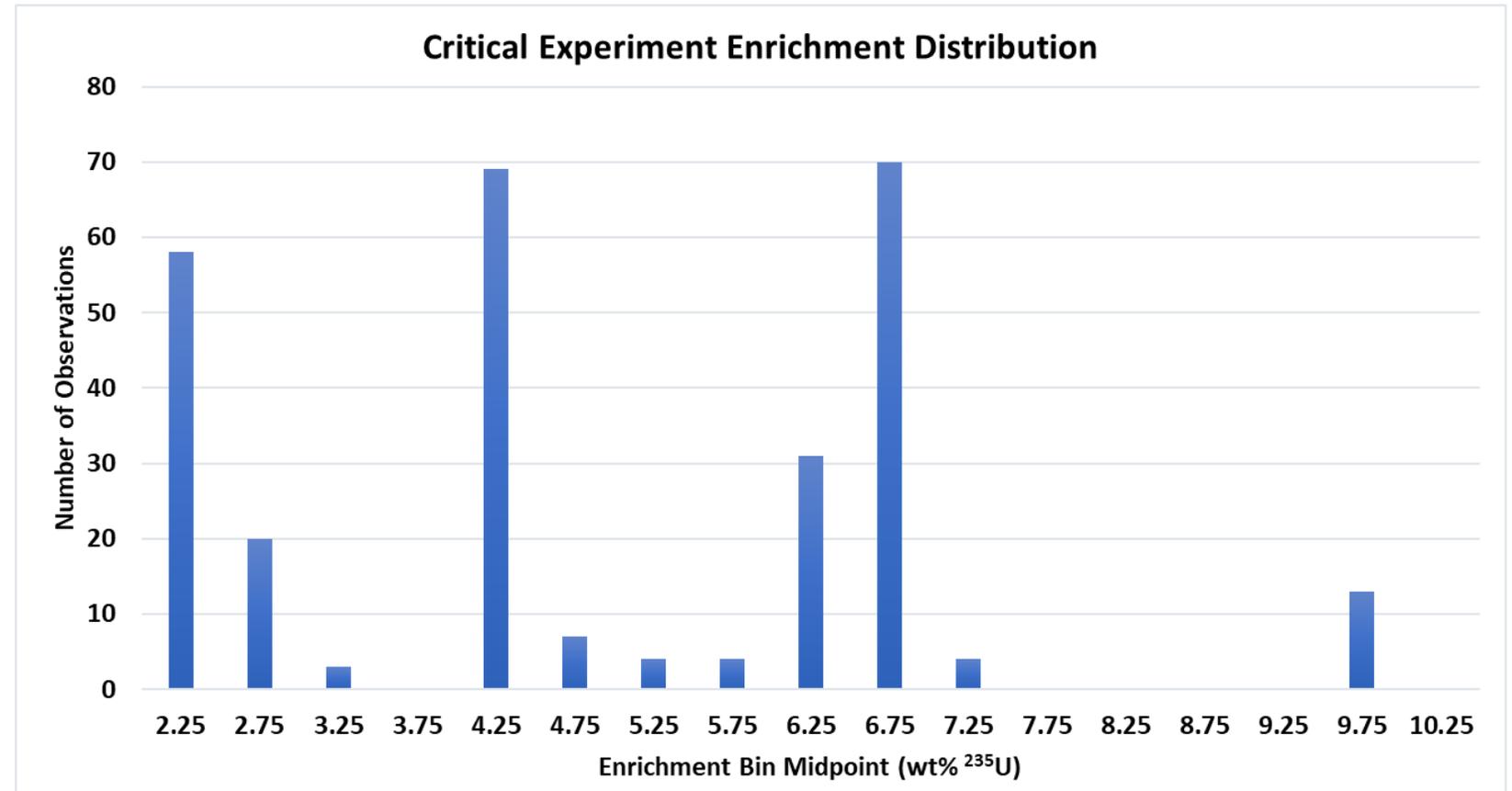
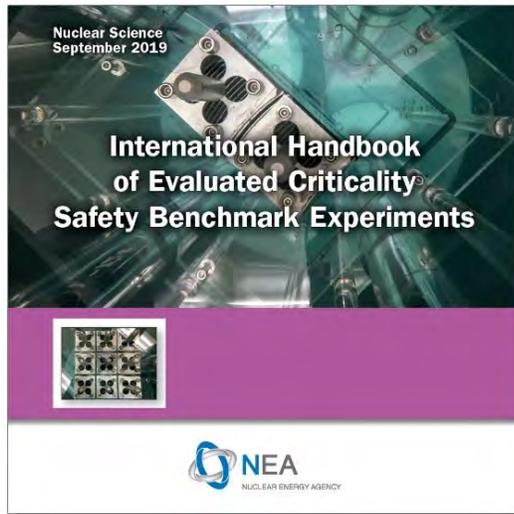
- Traditional method widely used by industry
- Choose experiments based on characteristics
- Table 2.3
  - Parameters
  - Parameter ranges
  - Area of applicability

*“These values [Table 2.3] are derived by a number of experienced criticality safety specialists and are necessarily conservative in order for a consensus to be obtained”.*

**Experiments chosen based on materials/geometry/energy spectrum similarity**

# Analysis Approach 2: Critical Experiments Selected

- Chosen using NUREG/CR-6698 method
- Most from ICSBEP Handbook
- 280 benchmark experiments
  - 2-10 wt%  $^{235}\text{U}$
  - Fuel pins in water
  - 0.05 – 2.1 eV neutron energy



**Significant number of experiments in the 5-8% range**

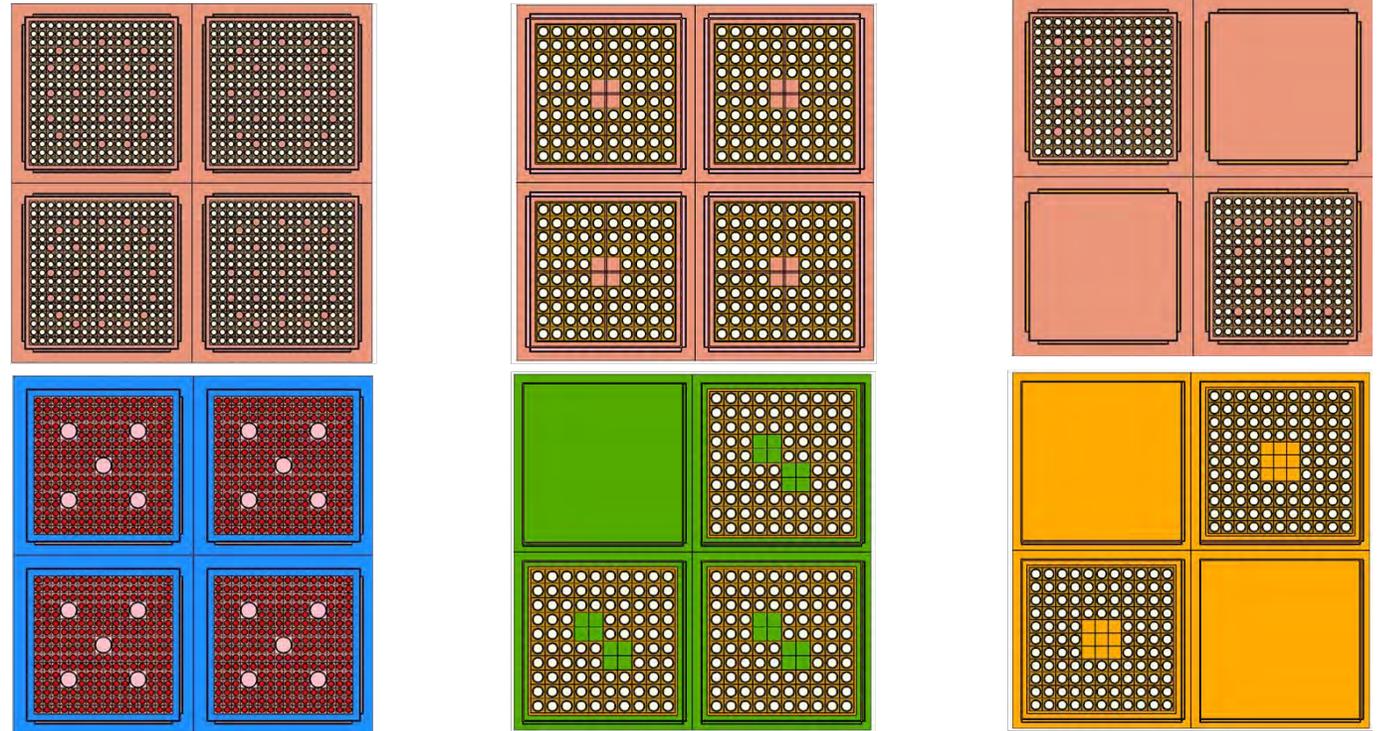


# Enrichment Similarity in the SFP

# Criticality Code Validation: Spent Fuel Pool Application Range

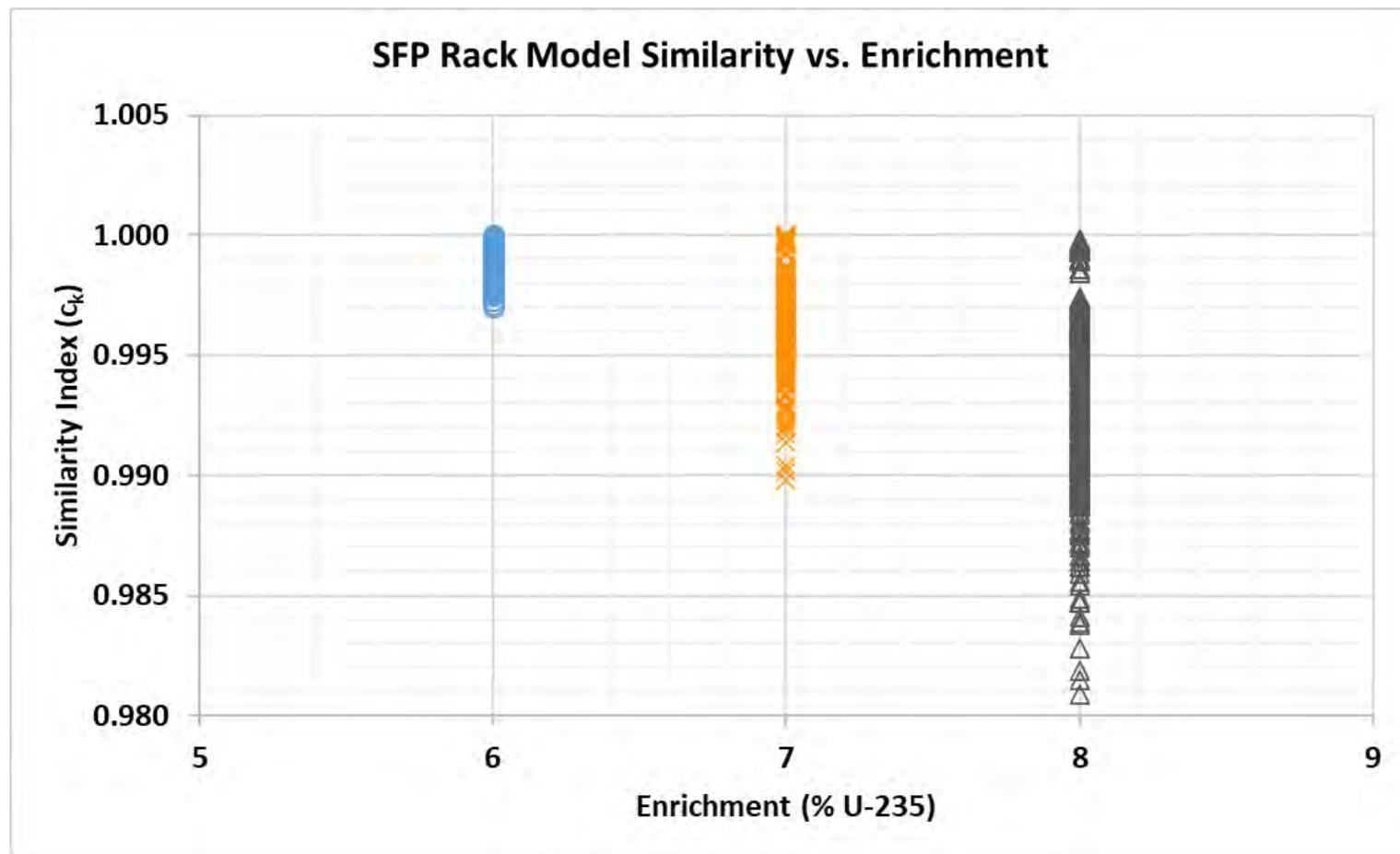
## Large Analysis for SFP

- PWR and BWR
  - Multiple designs
  - Poisoned and un-poisoned
  - Multiple enrichments
  - ATF Clad Coatings
- Region 1 and Region 2 Racks
  - Low, and high poison loading
  - 0, 400, 2500 ppm boron for PWR
- Multiple Loading Configurations
  - 1-out-of-4
  - 2-out-of-4
  - 3-out-of-4
  - 4-out-of-4
- Calculate Similarity Index ( $c_k$ )
  - “Apples and apples” comparison varying only enrichment



Flux-trap and non-flux-trap SFP rack designs, 1-out-of-4 to 4-out-of-4 configurations

# Analysis Approach 1 Results: Increased Enrichment



$c_k$  vs Enrichment for PWR and BWR Scenarios (Nominal Models at 5 wt. % U-235)

- SCALE Tsunami Similarity/Uncertainty
- Compare same rack model with different fuel enrichment
- Very high similarity indicates acceptable 5% enrichment validation is also acceptable for < 8% enrichment

**Very weak enrichment effect,  $c_k > 0.95$  indicates very high neutronic similarity**

# Analysis Summary and Conclusions

- Significant number of benchmark experiments in the 5-8% enrichment range
- Enrichment is a very weak variable for new fuel in the SFP
  - Same result across numerous fuel types, rack SFP types, configurations

# Publications

1. H. Akkurt and R. Hall, “*Recent Advancements in SFP Criticality for Existing LWR Fuels and Roadmap for Advanced LWR Fuels,*” Proceedings of International High level Radioactive Waste management Conference, November 2022.
2. R. Ferrer, J. Hykes, H. Akkurt, R. Hall, “*Extension of EPRI Benchmarks to Advanced LWR Fuels for SFP Criticality Depletion Uncertainty,*” Proceedings of International High level Radioactive Waste Management Conference, November 2022.
3. R. Ferrer, J. Hykes, H. Akkurt, R. Hall, “*Extension of Reactivity Decrement Uncertainty to Advanced LWR Fuels via Stochastic Sampling and Sensitivity-Based Verification,*” accepted for M&C 2023 conference, August 2023.

# Questions/Comments?



A blue-tinted photograph of four people standing in a row. From left to right: a woman with curly hair and glasses wearing a white lab coat with 'EPRI' on the pocket; a man with glasses wearing a white lab coat with 'EPRI' on the pocket; a woman wearing a white hard hat and a dark polo shirt with 'EPRI' on the chest; and a man with glasses and a beard wearing a light blue button-down shirt. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# Decay Heat: EPRI-SKB Collaboration for Extending Validation Range

**Hatice Akkurt**

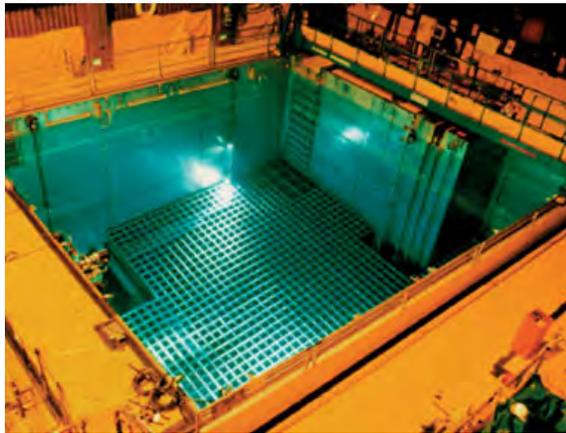
Used Fuel High Level Waste Management Program

**ACRS Meeting**

**May 18, 2023**



# Decay Heat is an Important Parameter That Impacts



## Spent Fuel Pool (SFP)

- SFP Heat Management
- Available storage capacity (due to limits for fuel off-loading time)



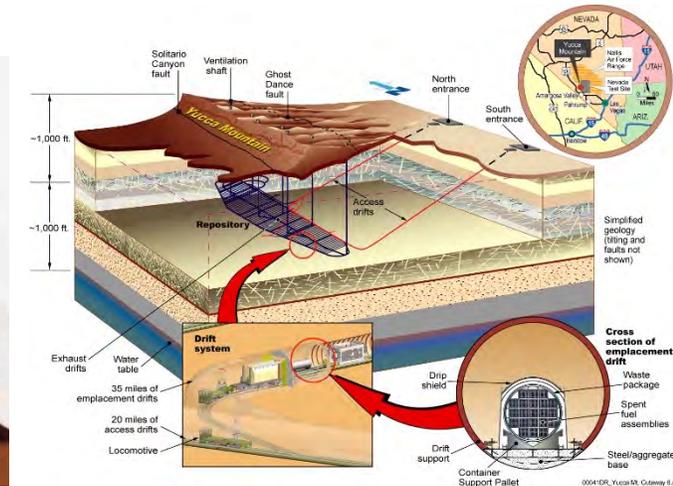
## Dry Storage & Centralized Storage

- Loading (Thermal limits – decay heat value and profile)
- Fuel/Cladding Integrity
- Canister Integrity
- Fuel/Clad and Canister integrity impacts are in opposite directions



## Transportation

- Transportation limits



## Disposal

- Heat load management
- Dictates number of casks/canisters that can be stored in repository

Reasonably accurate estimation of decay heat is important for the entire back-end

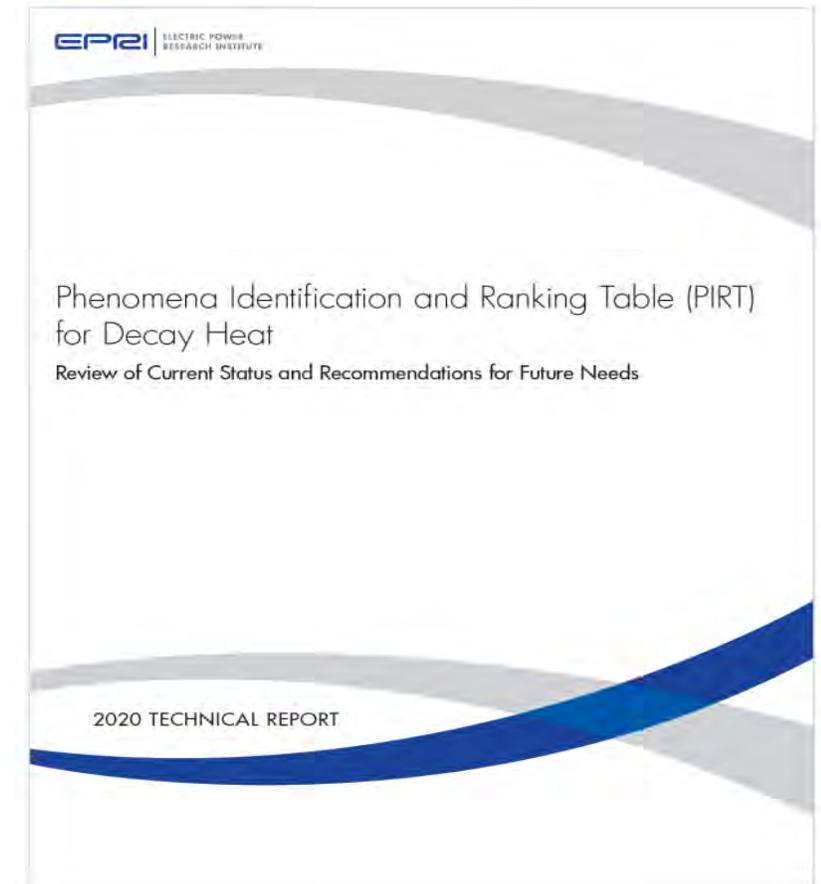
# Background: Decay Heat PIRT Report – Identified Technical Gaps

**Recommendation:** Publication of “unpublished” Clab decay heat measurements (see next slide)

## **Gaps: Need to expand parameter space for validation**

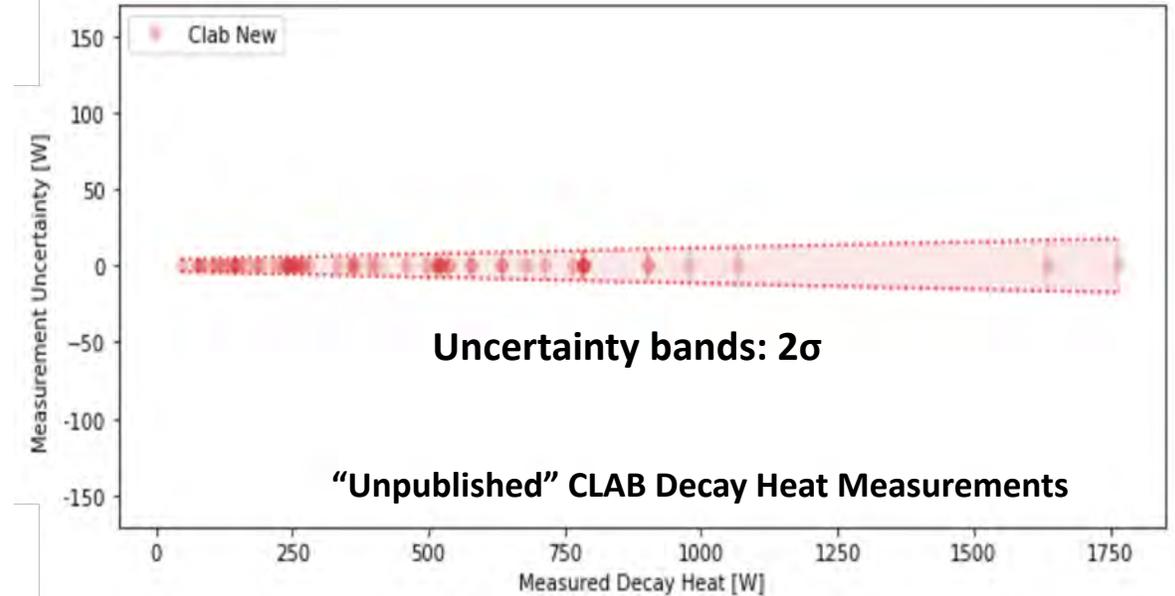
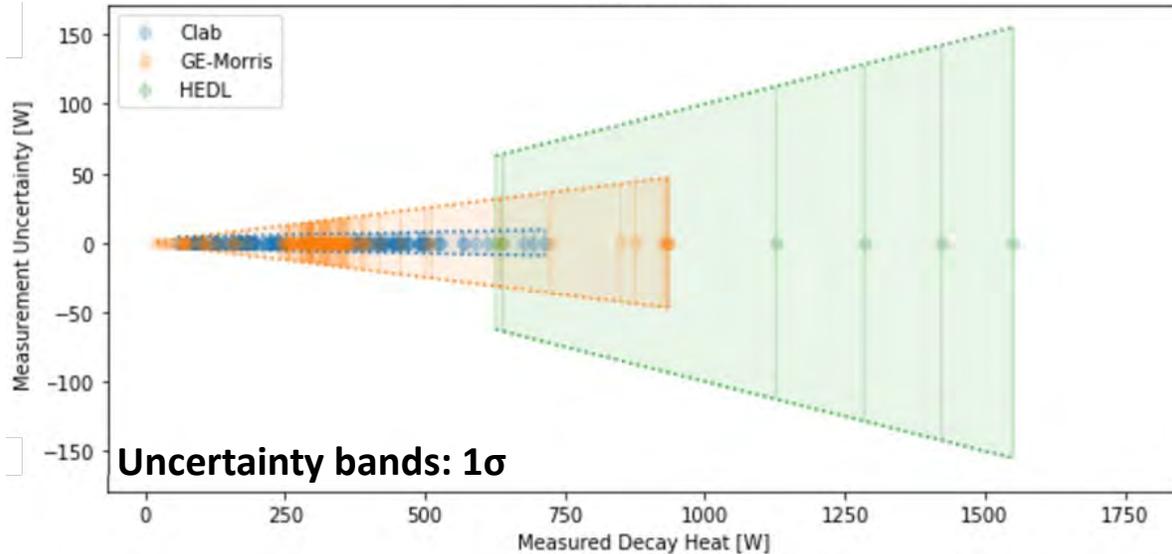
1. Decay heat measurements for
  - Shorter cooling time (1-2 years)
  - High burnup (above 51 GWd/MTU)
2. For **advanced fuels**, decay heat measurements for increased enrichment (above 4.0%) and increased burnup are needed

Parameter	Published Data
Decay Heat (W)	25–1550
Cooling Time (years)	2.5–27
Burnup (GWd/MTU)	up to 51
Enrichment (wt%)	1.1–4.0



EPR2 report **3002018440**, published July 30, 2020 – Publicly available

# Decay Heat (DH) Measurements – Published and Unpublished



- **HEDL:** Large measurements uncertainty; no other measurements for high DH range → can't be taken out of validation set yet
- **GE-Morris:** Measurement quality issues at higher DH; no other measurements → can't be taken out of validation set yet
- **CLAB:** Low measurement uncertainty; focus on low DH and only facility that continues measurements

- Over 60 new DH measurements that are not published
- Only two measurement points for high decay heat values → Can it be increased?
- High quality data → better validation set → decrease DH uncertainty and increase margins for global industry

Recommendation: Publication of unpublished CLAB measurements and performing new measurements to close the gaps → EPRI initiated a collaborative project with SKB

# EPRI-SKB Collaboration Agreement and Ongoing Collaborative Efforts

EPRI-SKB collaboration agreement signed in December 2020. Collaboratively working on the following tasks:

1. **Publication of unpublished CLAB decay heat measurements**
  - EPRI received > 150 unpublished decay heat measurements
    - Since agreement signed, SKB performed additional measurements using existing calorimeter for
      - High burnup, shorter cooling time, and GE14 fuel
  - Report will be a publicly available EPRI report
2. **Validation of decay heat measurements**
  - Using SNF and ORIGEN codes
  - Validation report will be a publicly available EPRI report
3. **Performing new decay heat measurements to close remaining technical gaps**
  - Building a new calorimeter to enable decay heat measurements for shorter cooling times
  - Performing new and repeat decay heat measurements

Parameter	Unpublished Measurements from Clab
Decay Heat (W)	up to 1725
Cooling Time (years)	1.5–35
Burnup (GWd/MTU)	up to 55
Enrichment (wt%)	up to 4.1

Parameter	Capacity of Current Clab System	Remaining Gaps
Decay Heat (W)	up to 2000	2000–4500
Cooling Time (years)	1–43	1–1.5
Burnup (GWd/MTU)	up to 60	Above 55
Enrichment (wt%)	up to 4.5	Above 4.5

# What is Clab?

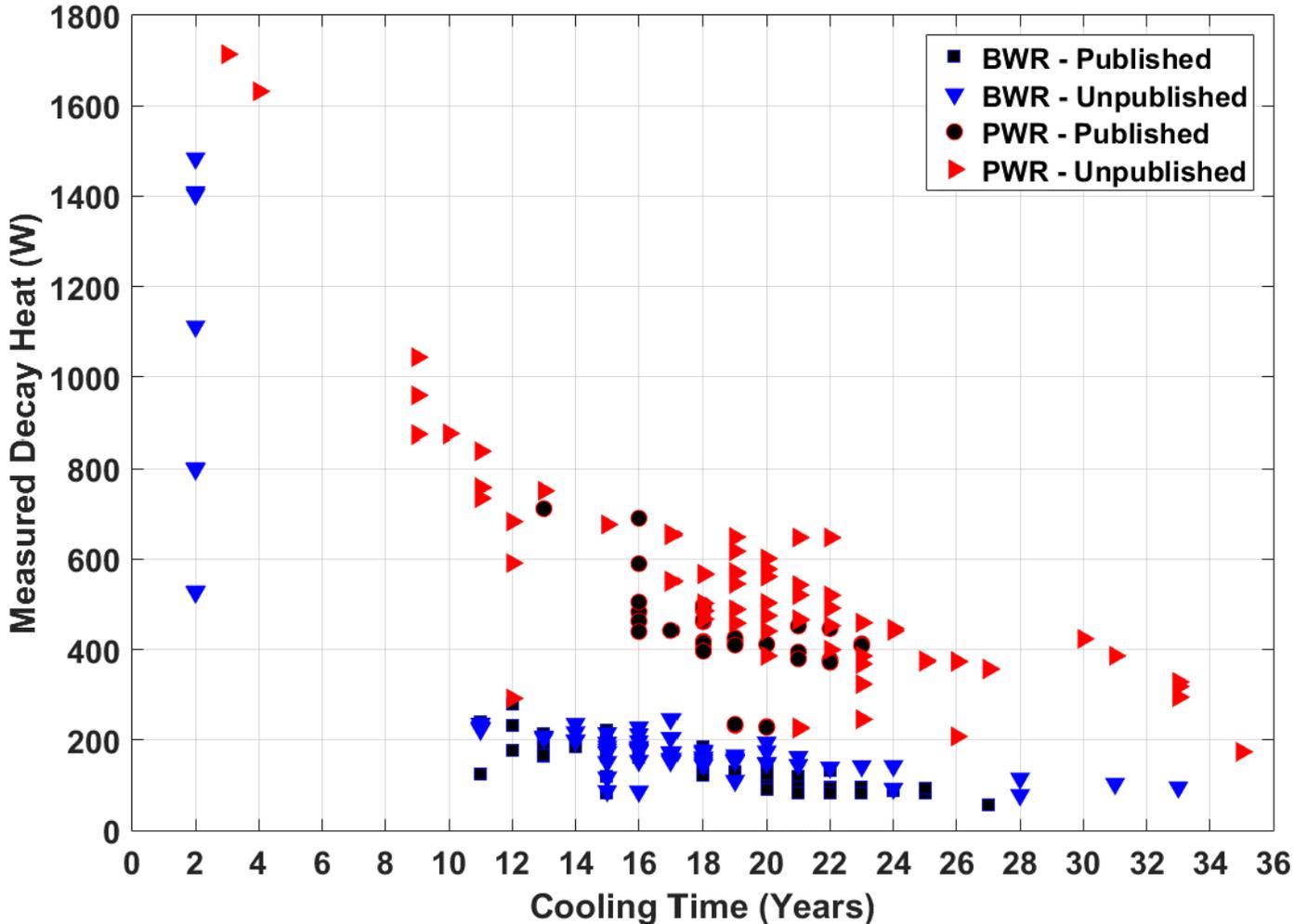
Intermediate wet storage for the whole Swedish nuclear program. In total 13 NPPs, (1 PHWR, 3 PWR, 9 BWR)

Today 33000 fuel assemblies with enrichments between 0,7-4,6 % U-235 and BU between 0-61.2 MWd/kgU. Cooling times between 1-40 years.

Unique possibilities to do decay heat measurements on a variety of fuel types and fuel with different characteristics.



# Extending Validation Range for Decay Heat

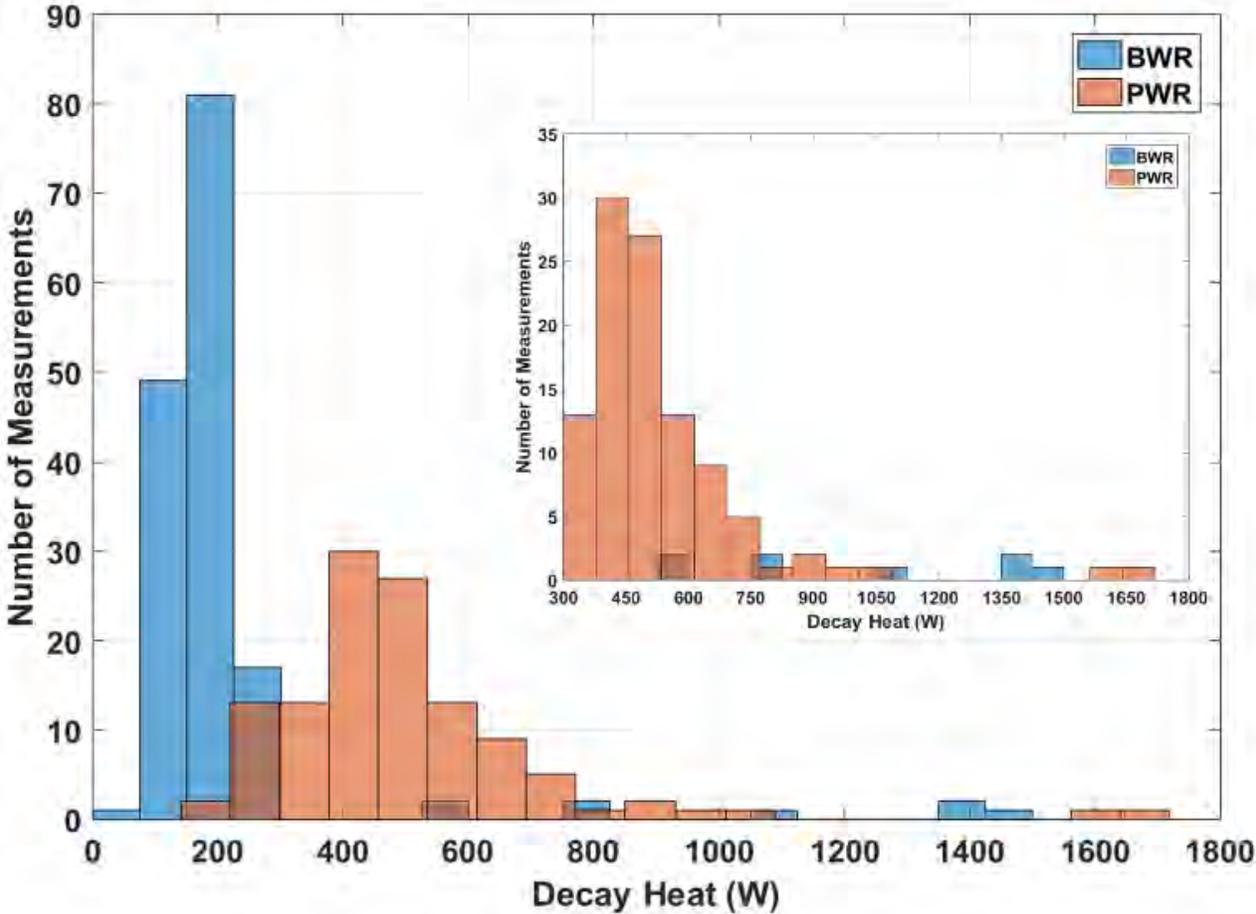
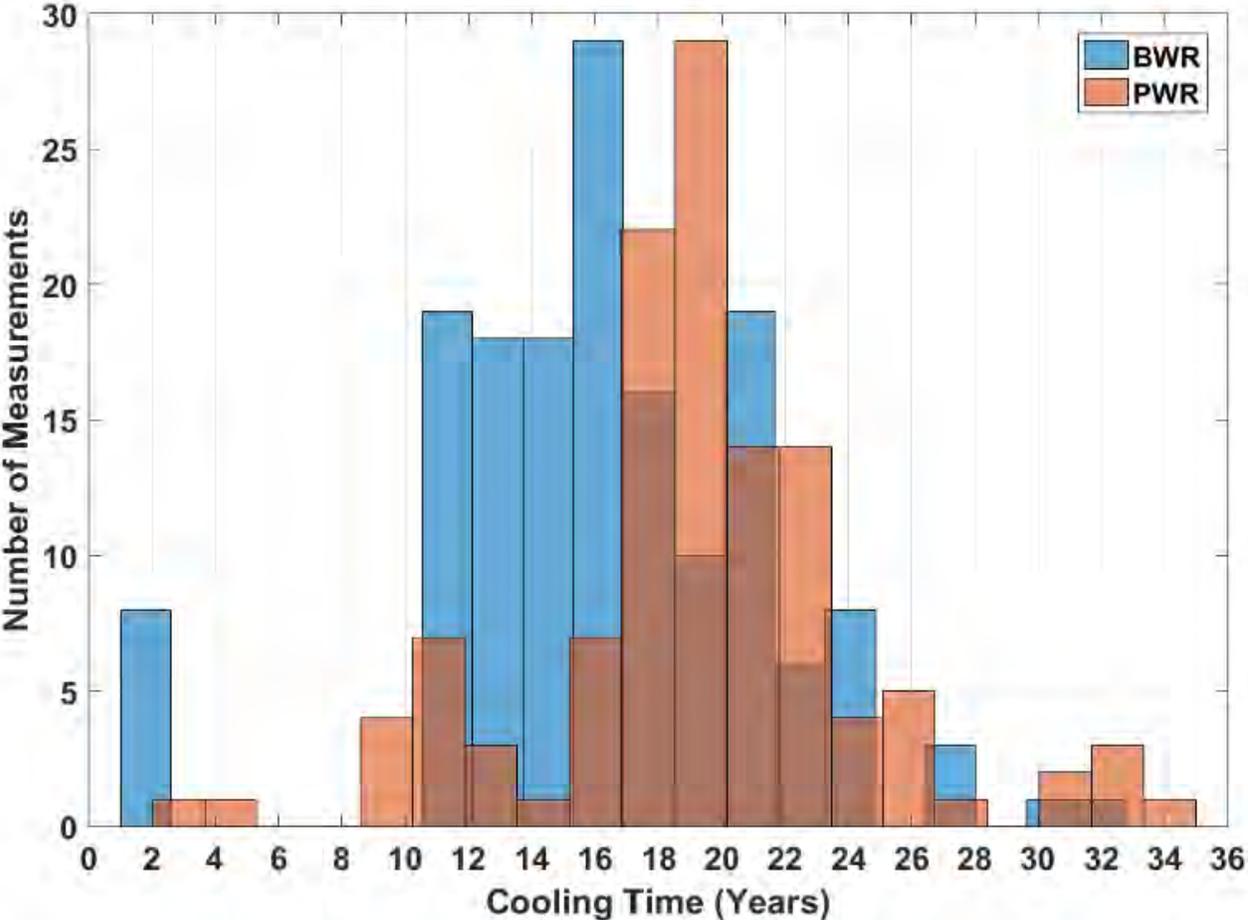


	SKB report*	Unpublished
Measurement interval	2003-2004	2005-2021
Number of Measurements	109	166
Enrichment range (%)	2.1-3.4	2.1-4.1
Burnup range (GWd/MTU)	15-51	20-55
Cooling time range (Years)	11-27	1.5-35
Decay heat range (W)	55-710	70-1725

\*Published in SKB Report R-05-62 in 2006

Unpublished measurements significantly extends decay heat validation ranges for cooling time and decay heat

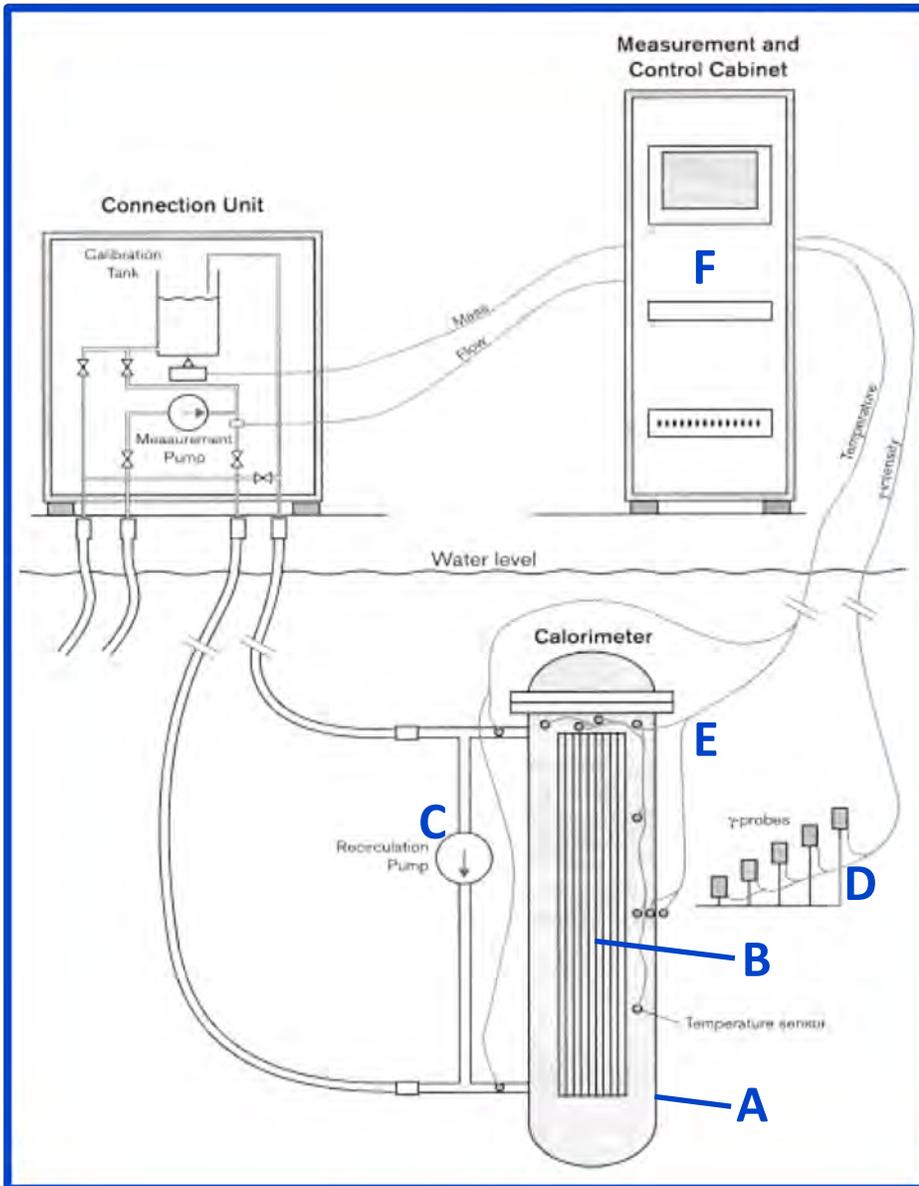
# Distribution of Clab Decay Heat Measurements



To date, measurement focus for lower decay heat and longer cooling times

# 2002 Calorimeter Schematic

## Key Calorimeter Components



- A. Insulated Container**
- B. Heater Assembly or Fuel Assembly**
- C. Circulation Pump**
- D. Gamma Detectors**
- E. PT100 Resistance Temperature Detectors**
- F. Data Acquisition and Recording**
- G. Heater Power Cable (Not Shown)**
- H. Pump Power Cable (Not Shown)**

# Sources of Uncertainty - Components

## Calibration (Heater) Measurement

Component	Uncertainty
Calorimeter	Heat loss to pool
	RTD accuracy
Pump	Heat added to calorimeter
Data analysis	T vs. time curve fit slope uncertainty
Heater	Power variation
	Power measurement accuracy
	Power cable losses



Calibration Curve Prediction Interval

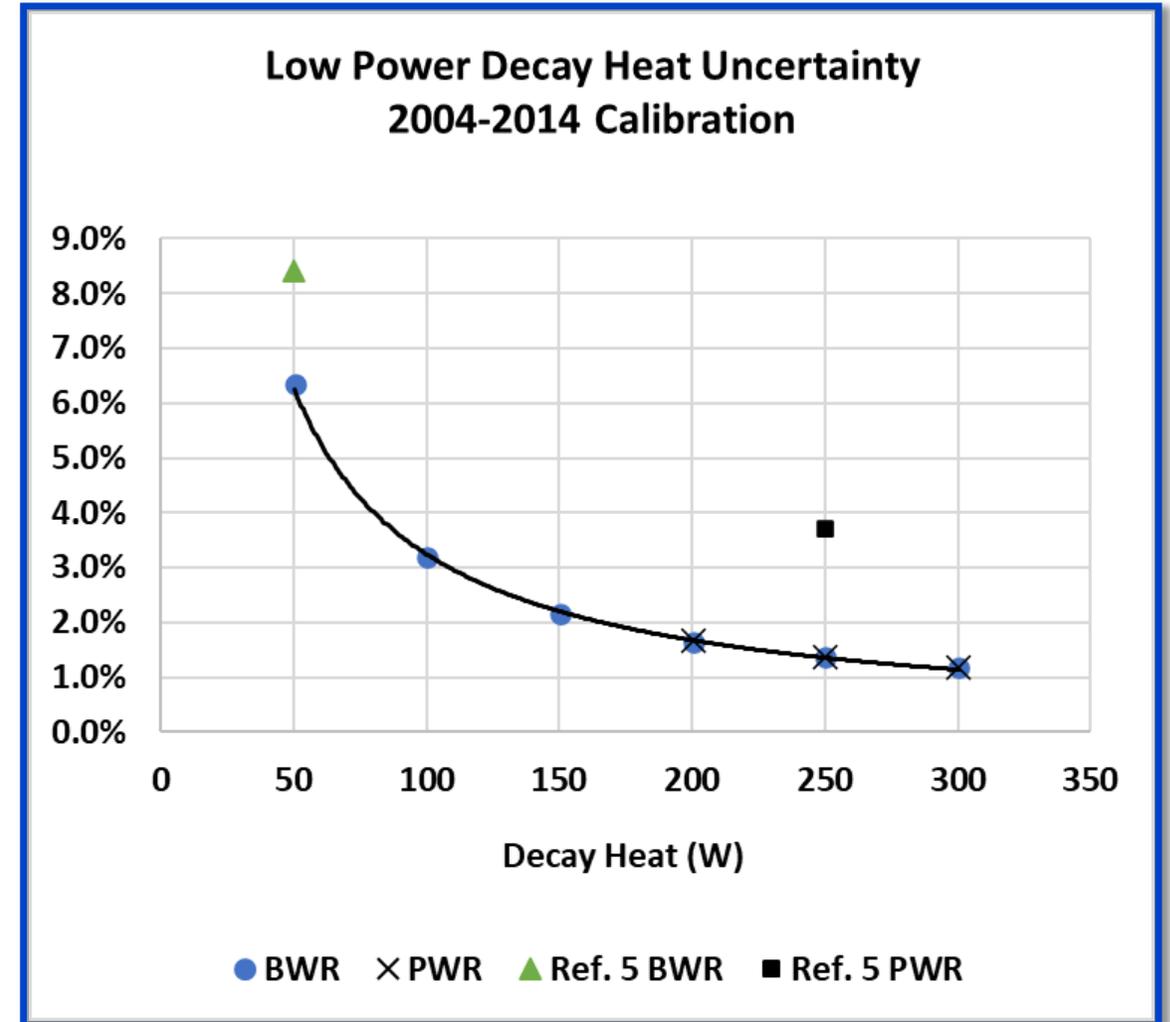
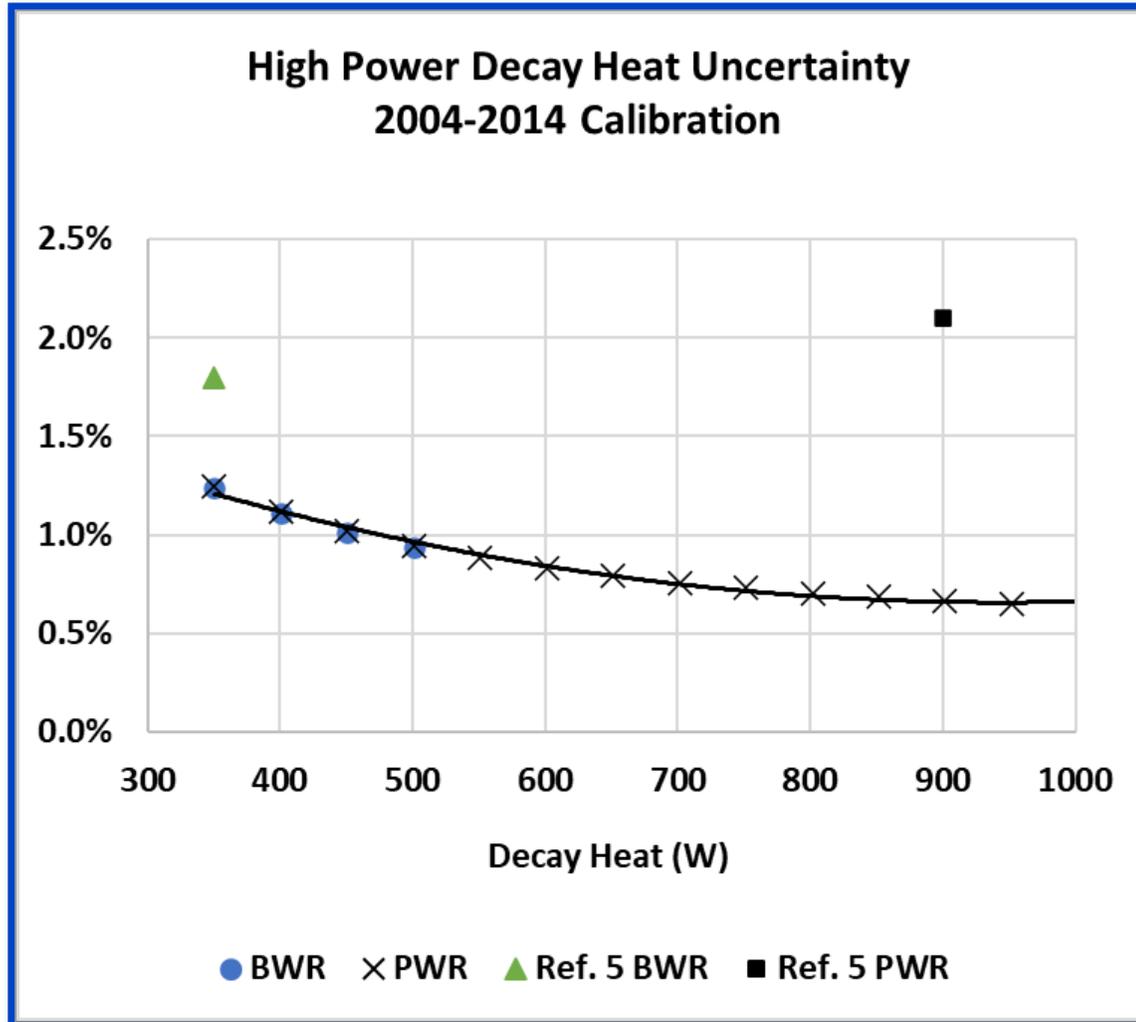
## Fuel Assembly (FA) Measurement

Component	Uncertainty
Calorimeter	Heat loss to pool
	RTD accuracy
Pump	Heat added to calorimeter
Data analysis	T vs. time curve fit slope uncertainty
Corrections	Heat capacity difference vs. heater + water
	Gamma energy loss



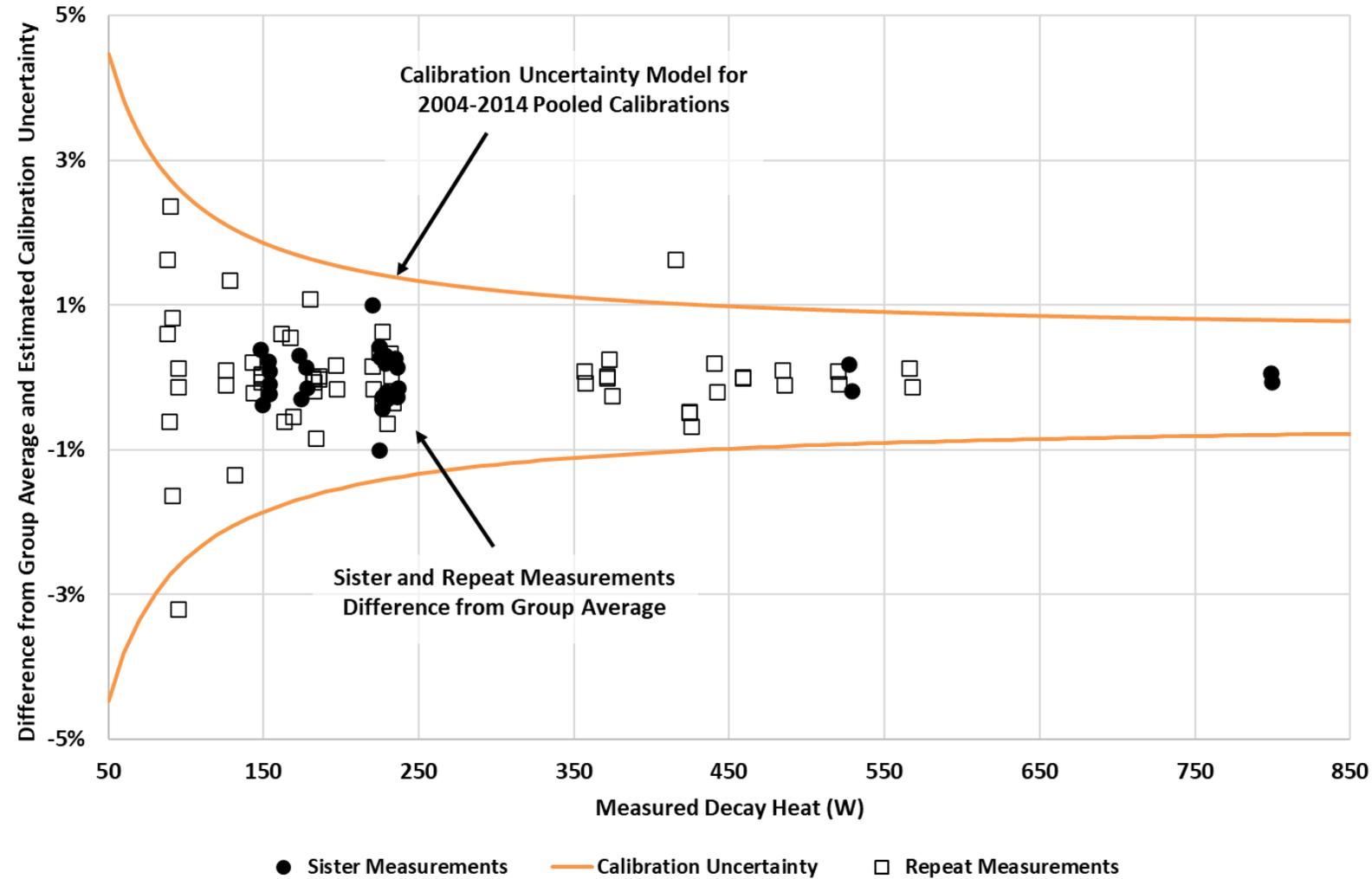
**FA Measurement Uncertainty: Some Common Components and Some Unique Components**

# Clab Decay Heat Measurement Uncertainty Assessment



**Uncertainty estimate is lower than 2006 report (SKB R-05-62) estimate**

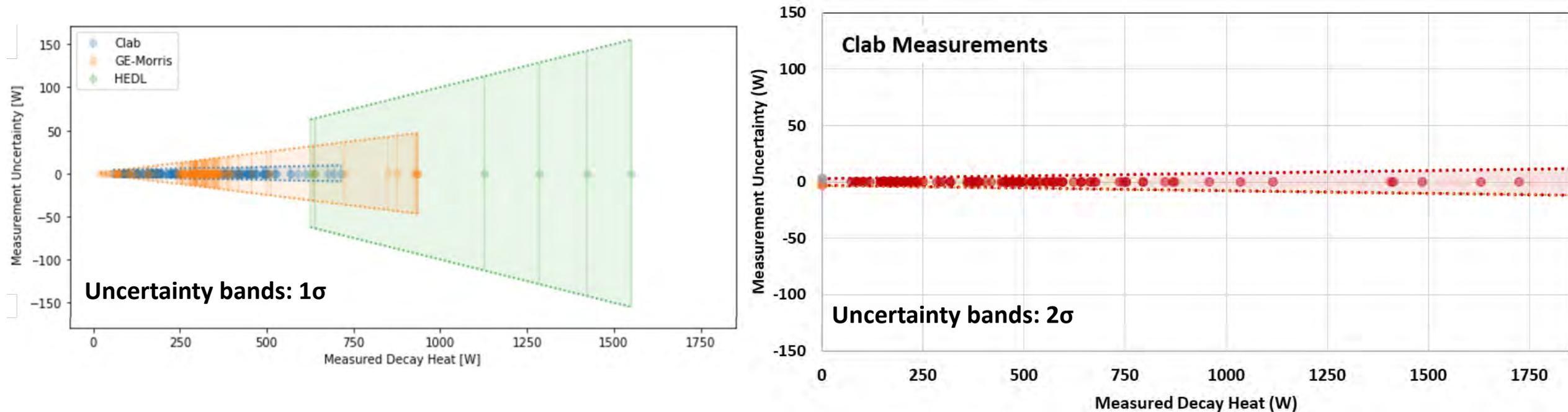
# Assessment of Uncertainty Evaluation with Repeat and Sister Assembly Measurements



- 60 repeat measurements
- 28 sister assembly measurements

**Only 2 (out of 88) points outside the uncertainty band – Very good agreement**

# Recommendations for Decay Heat Validation Set



- By including all Clab measurements, decay heat validation range is extended significantly.
- Therefore, after the publication of these measurements, recommending:
  - Removing HEDL measurements from validation set (large uncertainties and only few points)
  - If desired, selected GE-Morris measurements can be used but recommend use of inverse uncertainty weighting

**Extending decay heat validation range with low uncertainty measurements will benefit LEU+ fuel**

# Summary and Future Work

## 1. Decay heat PIRT identified a number of recommendations and data gaps

- Recommendation: Publication of “unpublished” Clab measurements
- Gaps: Extending decay heat validation range for higher burnup, shorter cooling time

## 2. EPRI and SKB signed collaborative work in December 2020

- Analyzing all measurements, including measurement uncertainty
- Measurement report expected to be published, as publicly available EPRI report in late 2023
- Also working on validation report (using Origen and SNF codes), which will be published in a publicly available EPRI report

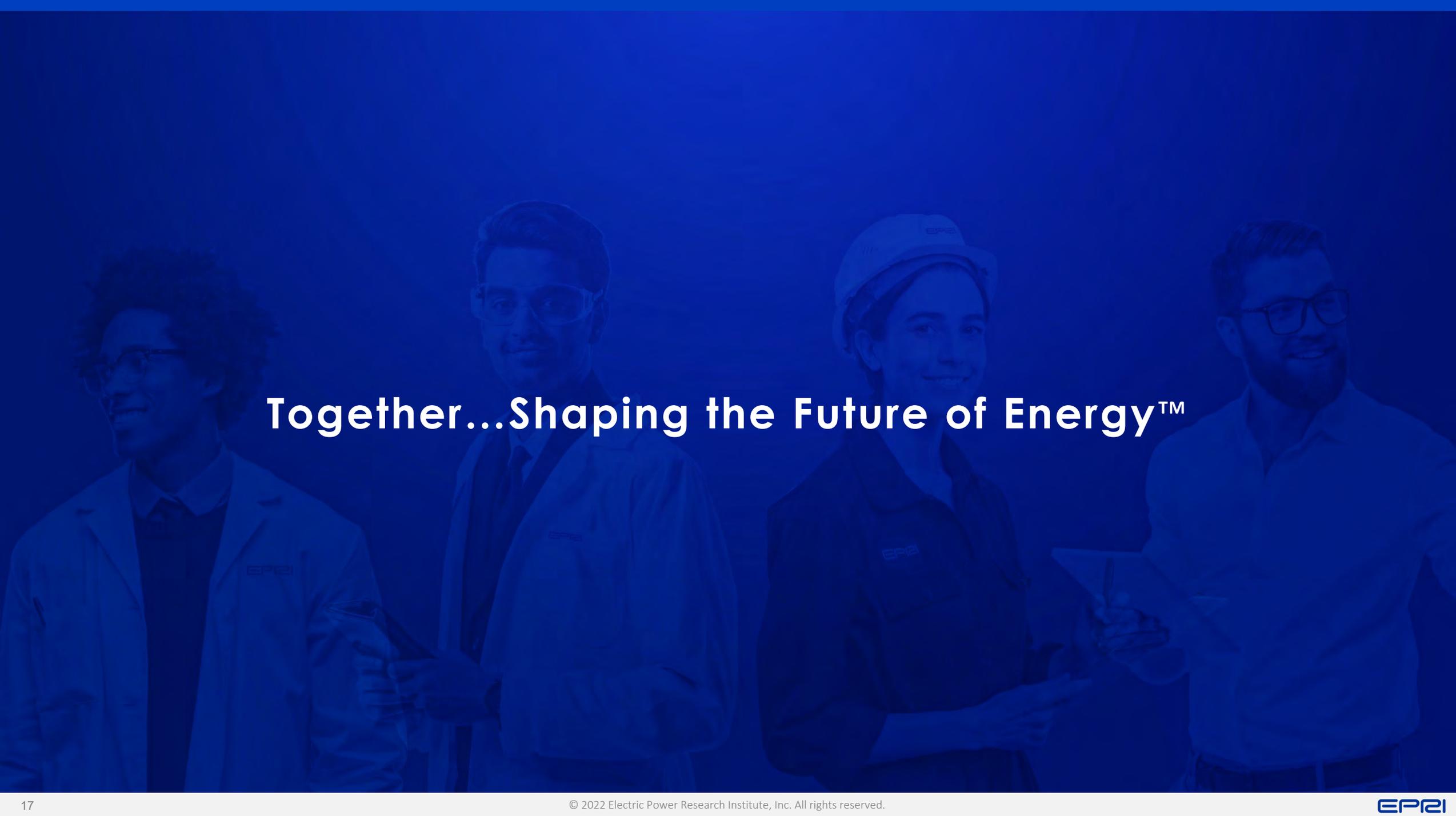
## 3. Performing new decay heat measurements to close remaining technical gaps

- Upgrading the calorimeter to enable decay heat measurements for shorter cooling times and higher burnup and filling the gaps for low-high decay heats
- Measurement campaign will start in 2024 with repeat measurements
- EPRI report for new measurements and validation results are expected to be published in late 2024

# Publications

1. H. Akkurt, R. Hall, F. Johansson, A. Mehic, J. Kierkegaard, H. Liljenfeldt, “*Decay Heat Evaluation for Extended Validation Range Using Clab Measurements,*” to appear in Proceedings of PATRAM 2023, June 23.
2. H. Liljenfeldt, H. Akkurt, R. Hall, F. Johansson, J. Kierkegaard, “*Decay Heat Measurements and Analysis for BWR Fuel with Shorter Cooling Time,*” Proceedings of International High Level Radioactive Waste Management Conference (IHLRWM 2022), November 2022.
3. F. Johansson, J. Kierkegaard, H. Liljenfeldt, R. Hall, H. Akkurt, “*Extending the Validation Range for Decay Heat Measurements,*” Proceedings of Global 2022 conference.
4. H. Akkurt, H. Liljenfeldt, G. Ilas, S. Baker, K. Banerjee, J. Scaglione, “*Parameter Identification and Ranking Table (PIRT) for Decay Heat*”, Proceedings of Top Fuel 2021, October 2021.
5. *Phenomena Identification and Ranking Table (PIRT) for Decay Heat: Review of Current Status and Recommendations for Future Needs.* EPRI, Palo Alto, CA: 2020. 3002018440.

# Questions?

A blue-tinted photograph of four people, two men and two women, standing in a row. They are dressed in professional attire, including lab coats and a hard hat. The text 'Together...Shaping the Future of Energy™' is overlaid in white on the image.

Together...Shaping the Future of Energy™

# Scoping Analysis for Decay Heat and Radiation Dose for ATF/LEU+/HBU

## Preliminary Scoping Results

Bob Hall

EPRI Used Fuel and High-Level Waste Program

May 18, 2023

## ACRS Meeting



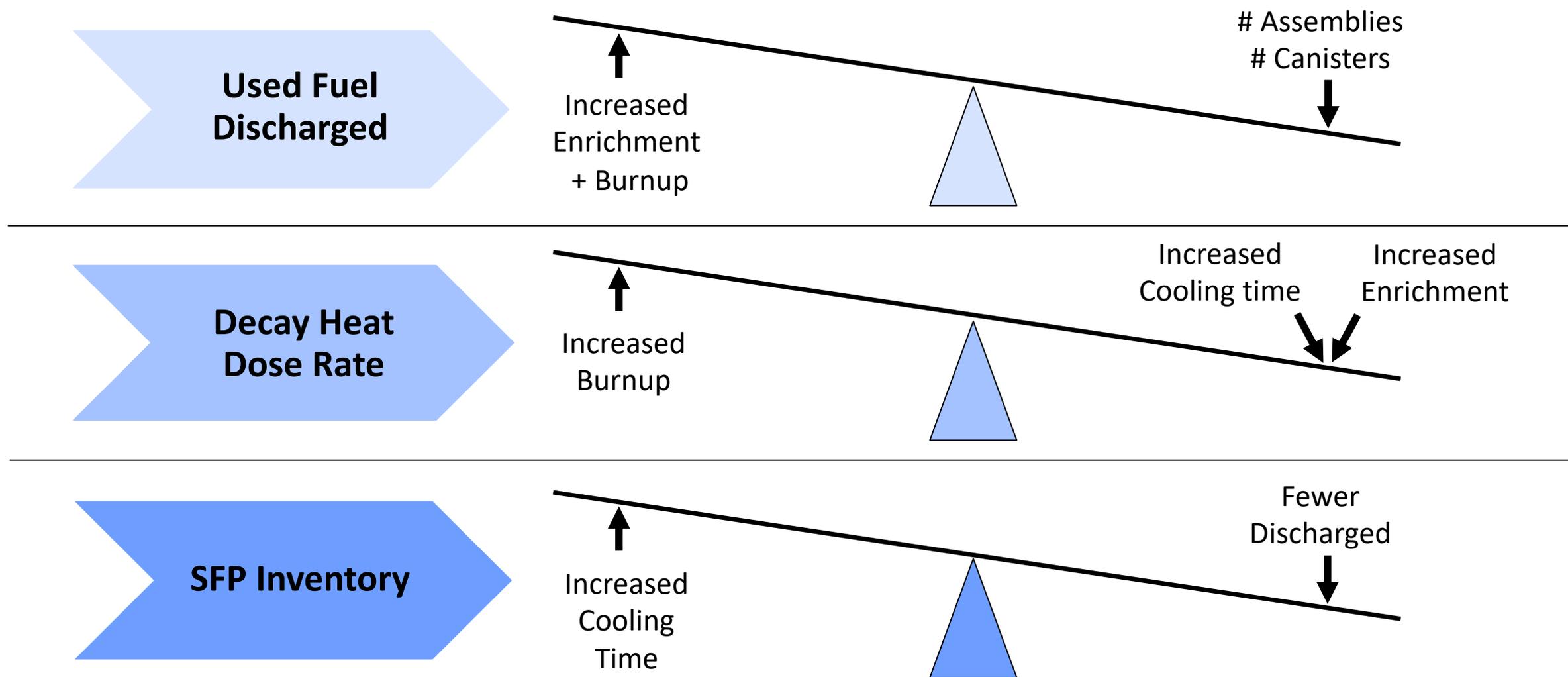
# Scoping Calculation for HBU – Purpose and Goals

---

- **Better understand effect of higher burnup (HBU) fuel on used fuel storage**
  - Decay heat (DH) and dose rate impacts of higher discharge burnup (DBU)
  - SFP inventory and heat load, transfer to ISFSI and dry storage dose rates
- **Estimate PWR equilibrium impacts of shift to increased burnup and enrichment**
  - 18-month cycle base case, 62 GWd/MTU peak rod burnup limit
  - 18-month cycle HBU case, 75 GWd/MTU peak rod burnup limit
  - 24-month cycle HBU case, 75 GWd/MTU peak rod burnup limit
- **Estimate batch average or sub-batch average enrichments and discharge burnups**
- **Identify key variables**
- **Estimate SFP inventory and decay heat trends, ISFSI dose rate trend**
- **High-level scoping, simplifying assumptions, not plant or dry storage system specific**

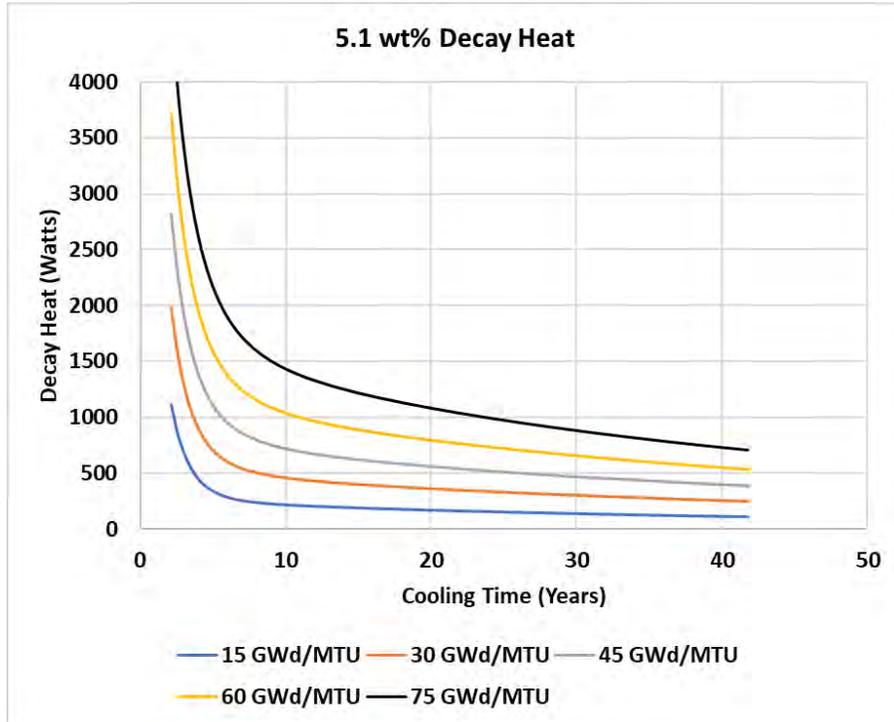
**\*\*Results are under review/preliminary, white paper publication in June\*\***

# LEU+/HBU: Decay Heat, SFP Inventory, and Dry Storage Dose Rates

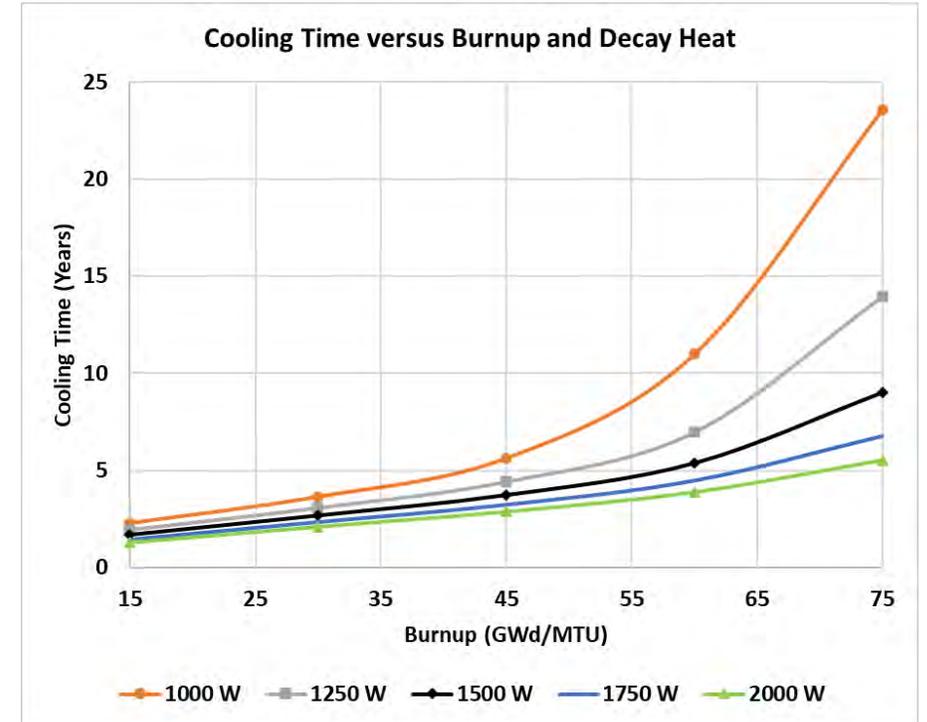


**Multiple opposing and offsetting effects, want to know net impacts.**

# Decay Heat, Burnup, and Cooling Time

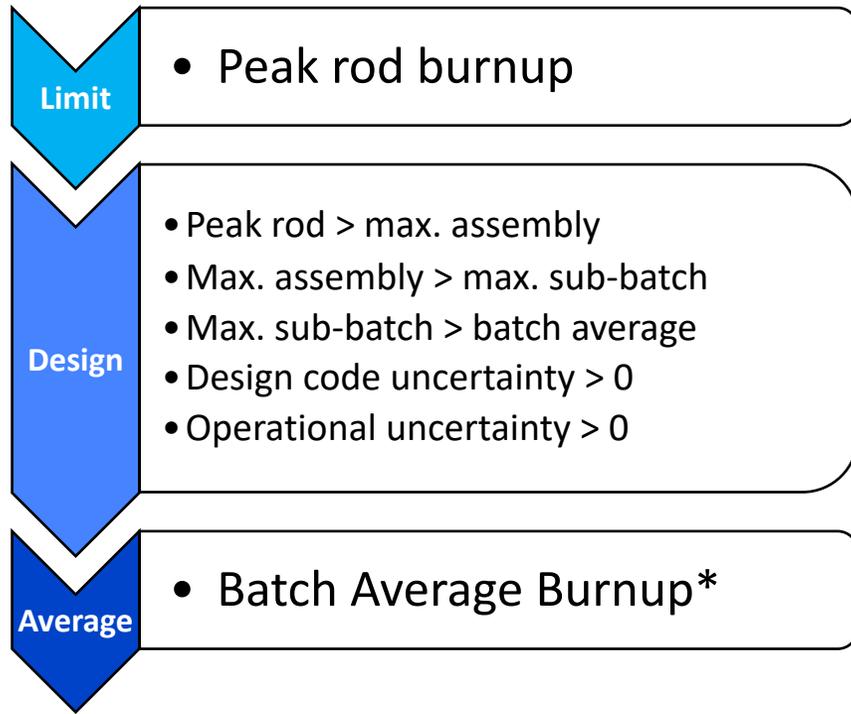


- 17x17 PWR
- Constant core-average power depletion
- Increased burnup increases DH
- Increased enrichment reduces DH
- **Cooling time is a strong function of DH limit at high burnup**



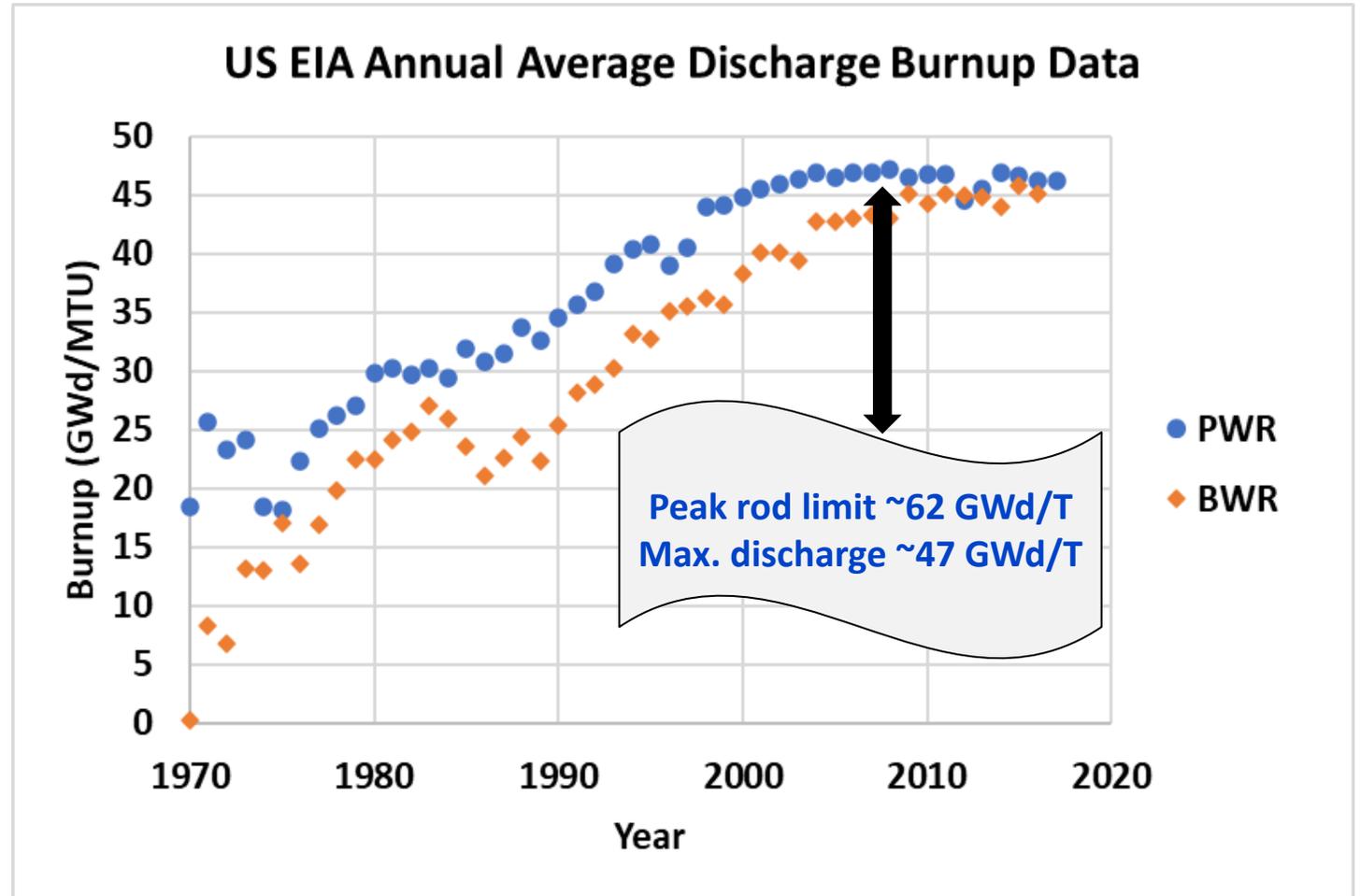
Use of realistic burnup and enrichment combinations is important

# Evaluation Needs Realistic Burnups and Enrichments



\* **Maximum practical batch average burnup ~80% ±5% of peak rod limit**

(Table 8, GC-859 data, ORNL/TM-2021/1961)



[https://www.eia.gov/nuclear/spent\\_fuel/ussnftab3.php](https://www.eia.gov/nuclear/spent_fuel/ussnftab3.php)

**Need to use realistic burnup and enrichment combinations for 62 and 75 GWd/T limits**

# Realistic PWR Batch Average Enrichments and Burnups

## Current PWR cycles

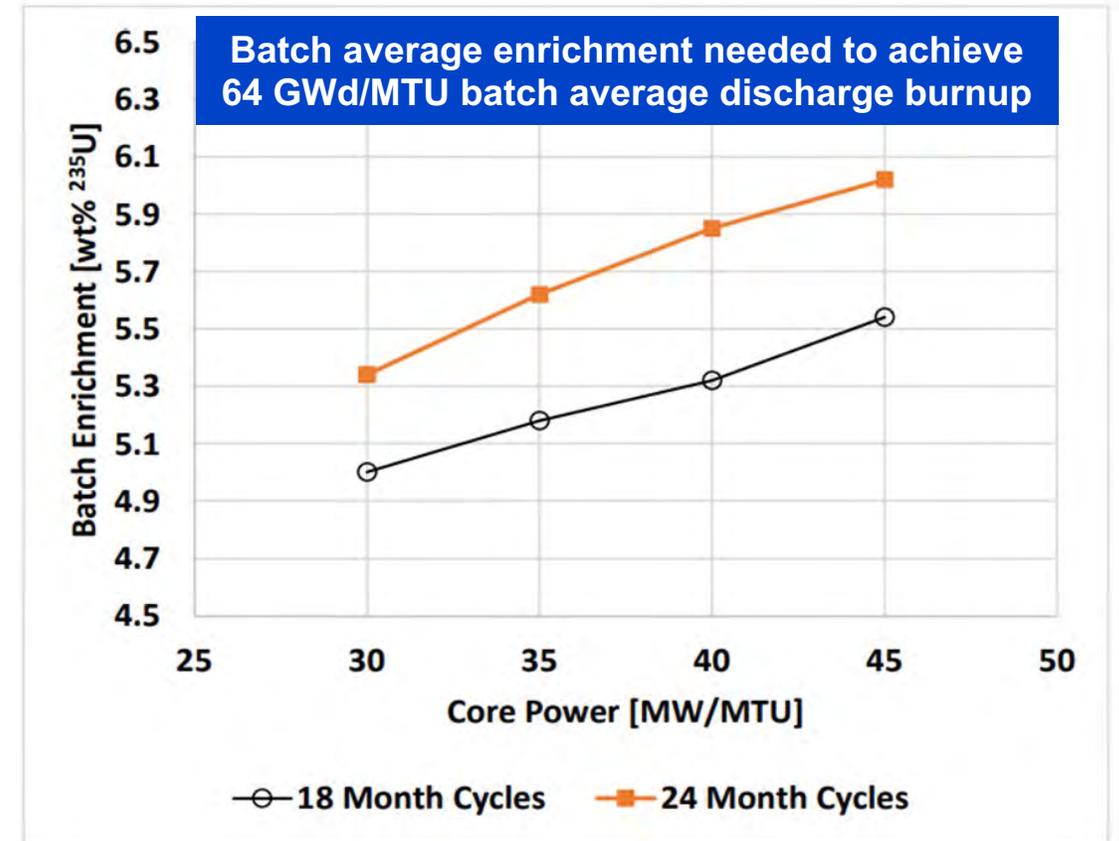
Batch average discharge burnup (DBU), using GC-859 data

- 44 GWd/MTU @ 4.0 wt%
- ~11 GWd/MTU/wt% <sup>235</sup>U initial enrichment
- Varies with cycle length, specific core power
- 0.1 to 0.5 wt% for split batch

## Scoping assessment PWR cycles

Use ORNL/TM-2021/1961 tool for enrichment, batch size, DBU

- Cycle estimator tool Benchmarked to GC-859, 6 PWRs, 26 cycles, and 2 24-month cycle studies
- Batch average enrichment within 0.2 wt% <sup>235</sup>U
- Estimate 18- and 24-month cycle enrichments and DBU
  - 51 GWd/MTU batch DBU for 62 GWd/MTU max. pin
  - 62 GWd/MTU batch DBU for 75 GWd/MTU max. pin
  - Final partial batch DBU limit 5% higher



Courtesy of Oak Ridge National Laboratory, U.S. Dept. of Energy

Data from ORNL/TM-2021/1961

# Analysis Cycles

- Core size 157 assemblies
  - 17x17 PWR, 39 MW/MTU, 0.47 MTU/assembly
  - 98% load factor
  - Reload batches are average and equilibrium
    - Some values not realistic for a single reload (e.g., 2 assembly sub-batch)

Case	Cycle Length	Batch Enrichment	Sub-Batch 1 Assemblies (2 cycles)	Sub-Batch 1 DBU	Sub-Batch 2 Assemblies (3 cycles)	Sub-Batch 2 DBU	Average DBU
1 (Base)	18 months (20 day outage)	4.4 wt%	41	45.3 GWd/MTU	25	53.3 GWd/MTU	48.3 GWd/MTU
2 (HBU 18)	18 months (20 day outage)	5.1 wt%	2	47.9 GWd/MTU	51	60.7 GWd/MTU	60.2 GWd/MTU
3 (HBU 24)	24 months (23 day outage)	5.4 wt%	65	56.8 GWd/MTU	9	64.8 GWd/MTU	57.8 GWd/MTU

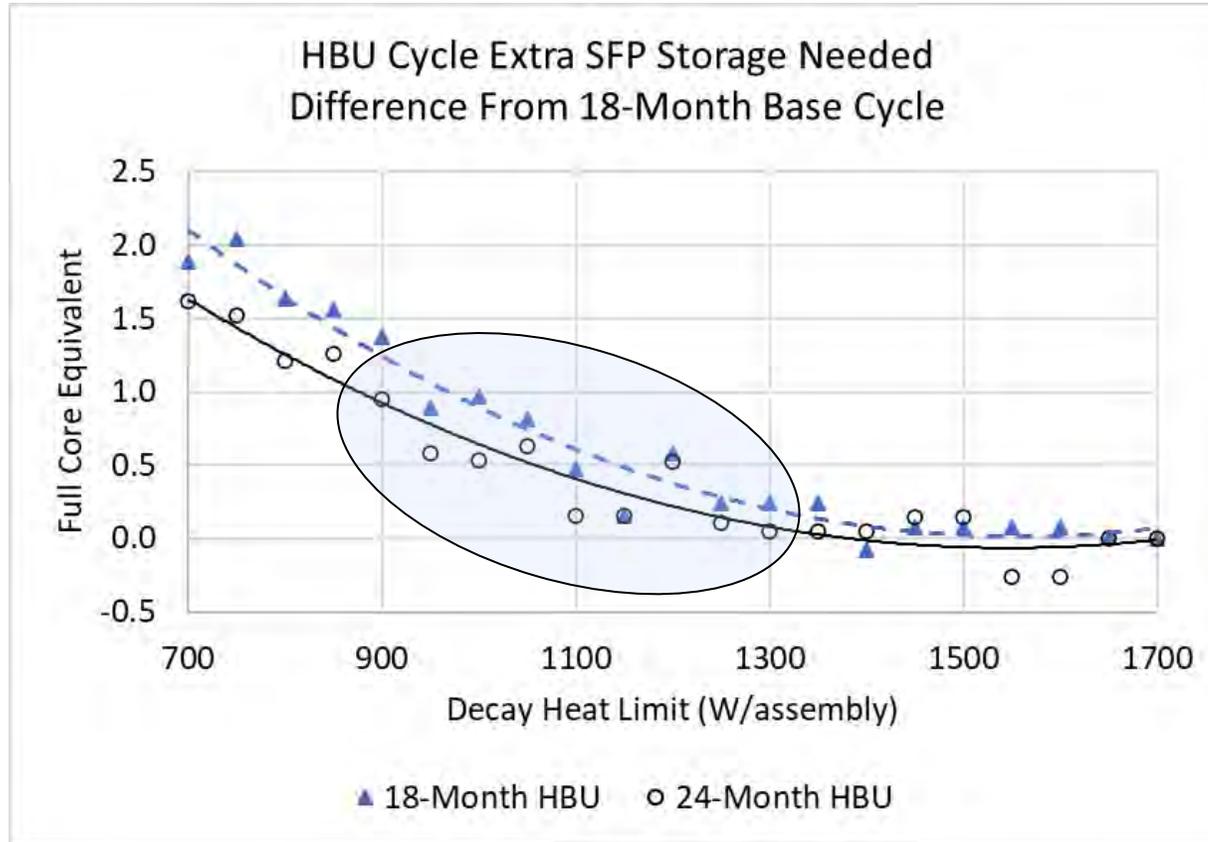
# Canister Decay Heat Limits

## Simplifying assumptions

- Arbitrary canister size for mock loadings
  - Capacity assumed equal to batch size
  - Attempt to load longest decay time sub-batch first by zone
  - Partial canister load allowed
  - Test case with fixed canister size produced similar results
- Representative of a range of current 37 assembly canister types
  - 42.5 to 50 KW total DH
- 5% conservatism applied to DH limits for simulation
- Calculate difference in un-loadable SFP population and peak SFP decay heat change

<b>Canister 1 (uniform)</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>
Decay heat limit (W)	1149	N/A	N/A
Zone fraction	1.0	N/A	N/A
<b>Canister 2 (zoned)</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>
Decay heat limit (W)	1000	2000	1313
Zone fraction	0.35	0.22	0.43
<b>Canister 3 (zoned)</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>
Decay heat limit (W)	874	1700	890
Zone fraction	0.24	0.32	0.43

# Simple HBU / SFP Inventory Illustration



- Equilibrium SFP inventory
- Single dry storage DH limit
- Smaller HBU batch size reduces SFP inventory
- Increased burnup increases cooling time and SFP inventory
- **Net effect is higher SFP inventory for current average canister DH limits**
- **DH limit is a key variable**

**Additional SFP space needed for HBU is a strong function of canister decay heat limit**

# HBU SFP Inventory Change Simulation Results

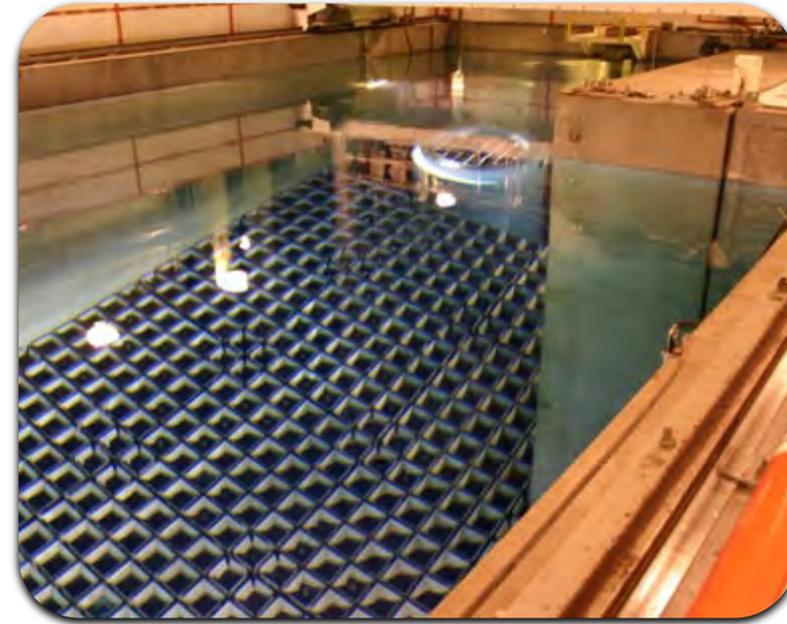
Canister	Loading	18 Month HBU	24 Month HBU
1	Uniform	0.2	0.2
2	Zoned	0.6	0.3
3	Zoned	1.3	0.8

- Units are full core equivalents of additional SFP fuel inventory due to HBU cycles
- Varies by DH limit, DH zoning (particularly low DH zone limit), cycle type, etc.
- Somewhat higher impact on 18-month HBU cycles (higher batch average DBU than 24-month)
- Due to multiple important variables, suggest plant/cycle/canister specific assessment

**Results are broadly similar to simple illustration**

# HBU SFP Maximum Decay Heat\* Simulation Results

Case	Canister	HBU increase in maximum DH
HBU (18 month)	1	2.8%
	2	3.9%
	3	4.9%
HBU (24 month)	1	1.9%
	2	2.3%
	3	3.0%



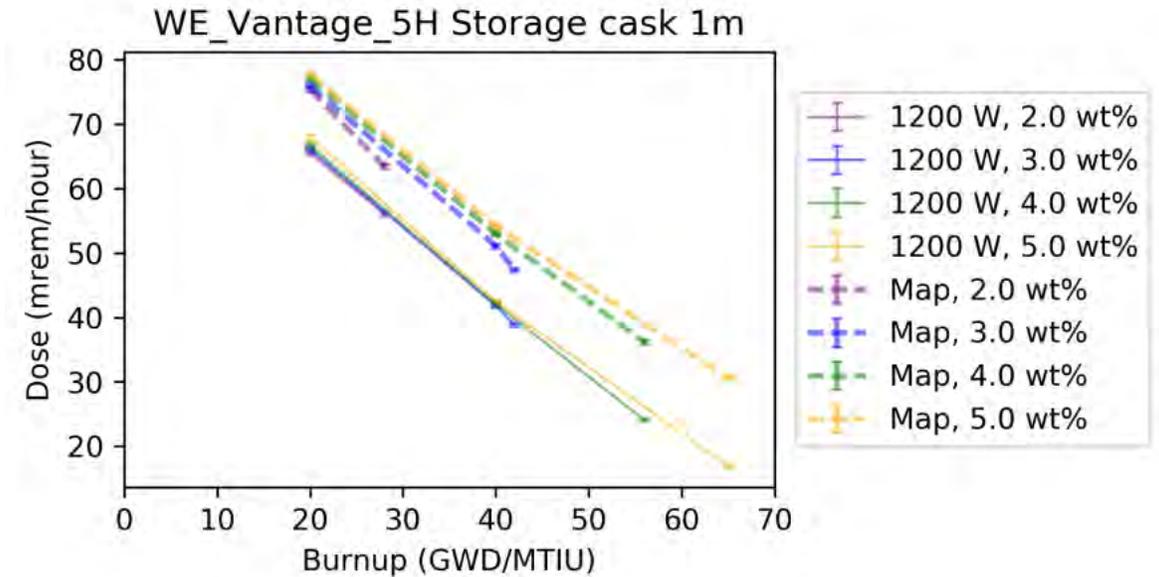
\*Maximum decay heat occurs at the end of core offload. Short cooling time (~140 hours) core decay heat is a weak function of burnup. Large majority of peak decay heat is from just-offloaded core. Increase is from increased burnup of offloaded core and increased SFP inventory.

**Modest increase in maximum SFP heat load**

# Dose Rate Trends – ORNL/SPR-2020/1441 Study

## ORNL “isocaloric” dry storage canister dose rates

- Uniform loading with all assemblies 1200W decay heat
- Different enrichment / burnup combinations
  - 3.0 wt% / 42 GWd/MTU
  - 4.0 wt% / 56 GWd/MTU
  - 5.0 wt% / 65 GWd/MTU
- Increased decay time required more than offsets increased burnup for gamma dose rate
- Gamma dose rate dominates in normal storage conditions
- Neutron dose rate change a mixed bag
  - Depends on specific enrichment/decay time/burnup



Courtesy of Oak Ridge National Laboratory, U.S. Dept. of Energy

**Normal storage condition dose rates decline due to HBU**

# Dose Rate Trends – EPRI Cask Loader Software Simulation

## Dry storage system normal storage

- Comparison of 18-month cycle base case and 24-month cycle HBU case
- Normal dry storage configuration
- Uniform 1100 W/assembly loading
- Neutron and gamma dose rate figure of merit (FOM)
- Case run to confirm conclusions from ORNL data

**Combined FOM/canister reduced 8%**

- -9% gamma FOM/canister
- +25% neutron FOM/canister

**Number of canisters loaded is reduced 16%**



**Small or beneficial dry storage dose rate changes due to HBU**

# HBU/SFP Scoping Calculation Conclusions

---

## 1) Modest increase in SFP inventory over time

- Offsetting effects
- Net result depends on multiple variables (canister DH limits, DH zoning, cycle length, etc.)
- Equilibrium impact takes multiple cycles to build-in, provides time to accommodate

## 2) Modest increase in SFP peak decay heat (~2%-5%)

- Net result depends on multiple variables (canister DH limits, DH zoning, cycle length, etc.)

## 3) Number of dry storage canisters loaded will decrease 15-20%, reducing total dose

## 4) At normal conditions, individual dry storage system dose rates will also likely to decline

- Normal storage is gamma dominated
- Additional cooling time needed for HBU reduces gamma dose rate

## 5) Scoping calculations used simple methods and numerous simplifying assumptions

- Recommend plant/cycle/canister specific assessment for confirmation and transition planning

**SFP inventory impacts appear modest, occur gradually over multiple cycles.  
Normal condition dry storage dose rates likely to decline (per canister and total).**

# Questions/Comments?



A blue-tinted photograph of four people, two men and two women, standing in a row. They are all wearing white lab coats with the EPRI logo on the left chest. The woman on the far right is wearing a white hard hat. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy®**

# Extended Storage Collaboration Program (ESCP): Collaborative Forum for Addressing Global Technical Challenges Around Used Fuel

**Hatice Akkurt**

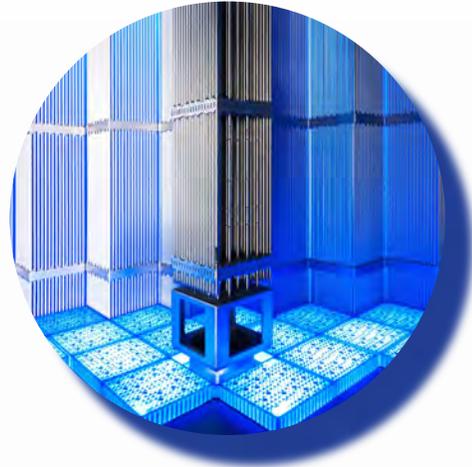
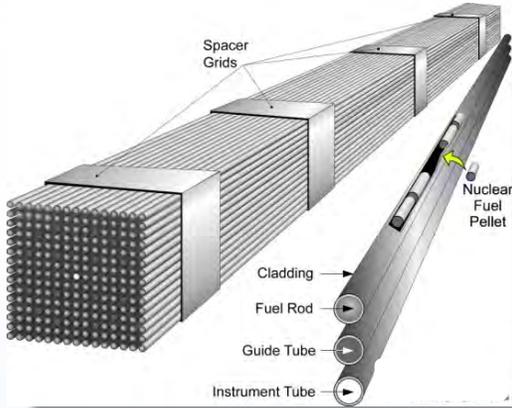
Used Fuel High Level Waste Management Program

**ACRS Meeting**

**May 18, 2023**



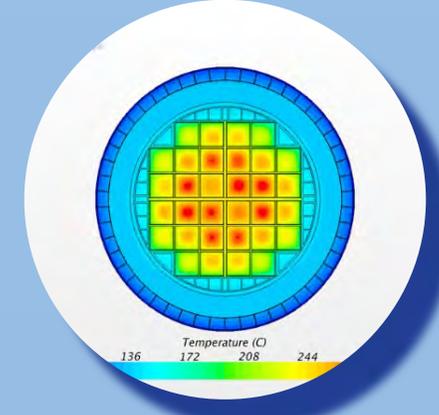
# Managing Extended Storage of Used Fuel: Technical Challenges



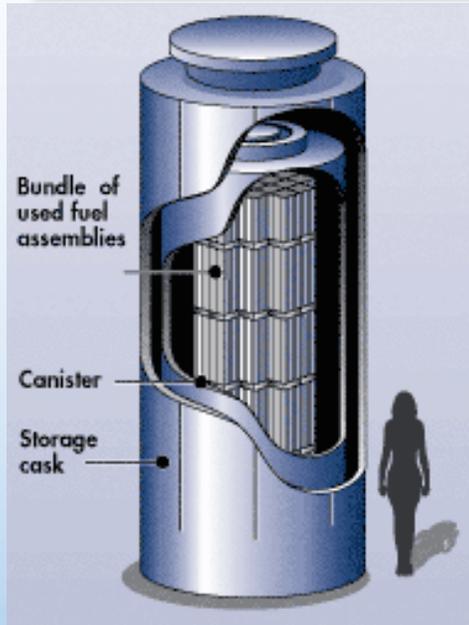
Fuel Cladding Integrity



Aging Management of Dry Storage Systems



Accuracy of models: Thermal, decay heat, and dose models



Collaborative R&D to Inform and Transform

EPRI formed Extended Storage Collaboration Program (ESCP)

# Extended Storage Collaboration Program (ESCP)

## Mission

- **Enhance the technical bases to ensure continued safe, long term used fuel storage and future transportability**

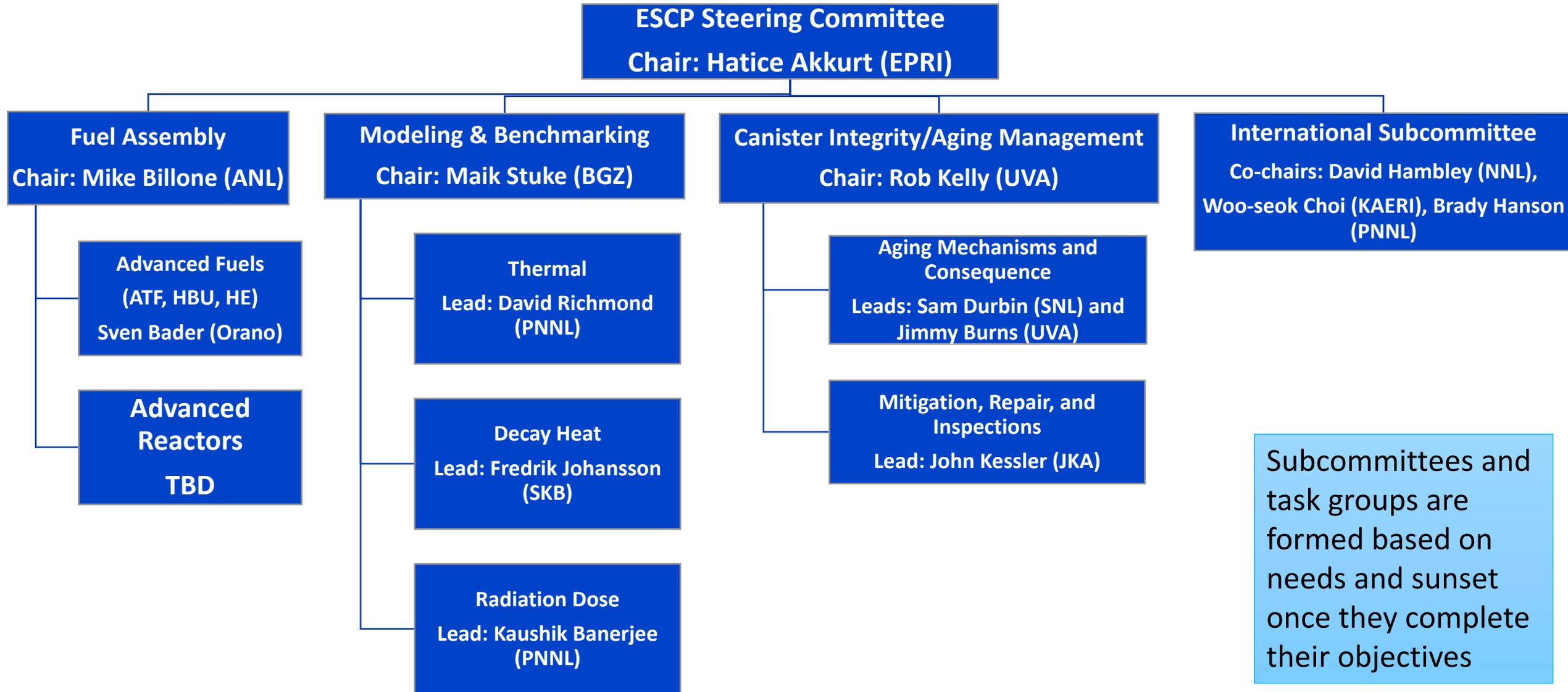
## Goals

- Bring together US and International organizations engaged with active or planned R&D in used fuel area
- Share information
- Identify common goals and needs
- Identify potential areas of “formal” collaborations

## Phases

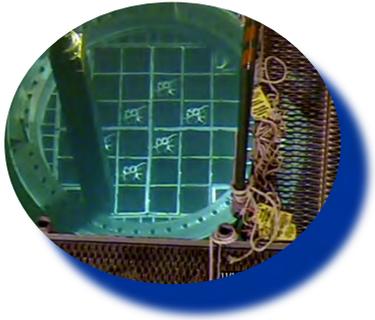
- **Phase 1:** Review current technical bases and conduct gap analysis for storage systems
- **Phase 2:** Conduct experiments, field studies, and additional analyses to address gaps
- **Phase 3:** Long-term performance confirmation

# ESCP Structure - Subcommittees (SCs) and Task Groups (TG)



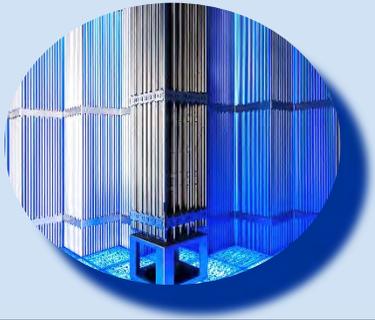
Subcommittees and task groups are formed based on needs and sunset once they complete their objectives

# Spent Fuel Integrity R&D



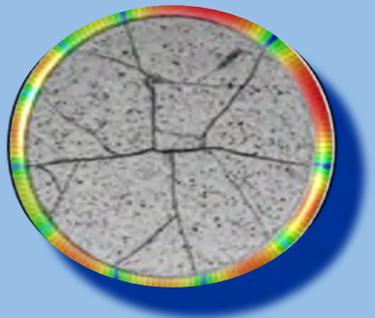
## EPRI/DOE High Burnup (HBU) Demonstration Program

- ✓ Demonstrate high burnup fuel performance
- ✓ Supports dry storage license renewals



## Improved Performance Margins

- ✓ Measured temperatures much lower than estimated
- ✓ Identified performance margins exist
  - ✓ Multiple PIRTs since HBU Demo loading

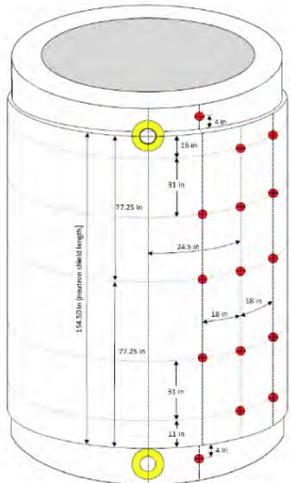
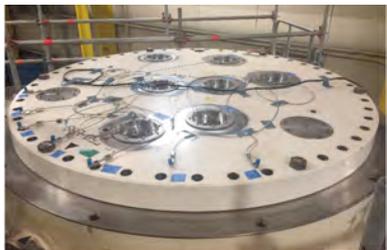


## Key High Burnup Fuel R&D Findings

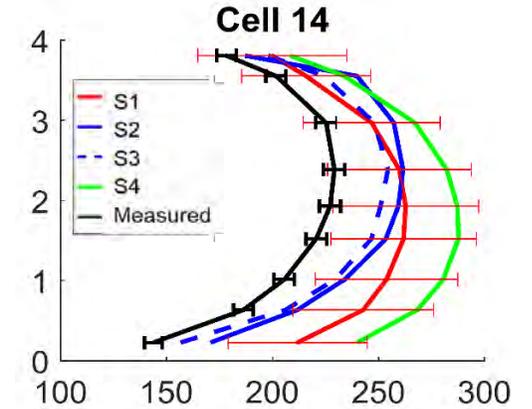
- ✓ High burnup fuel more robust than originally understood
- ✓ Dry storage and transportation are safe



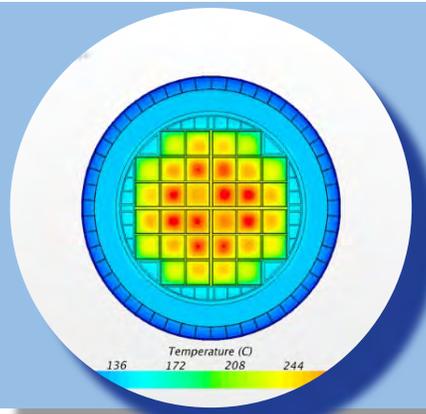
# HBU Demo showed measured temperatures are much lower



Parameter	FSAR	LAR	Best-Estimate	HBU Cask Meas.
PCT	348°C	318°C	254-288°C	229°C
Total Heat Load	36.96 kW	32.934 kW	30.456 kW	30.456 kW
Ambient Temperature	100°F	93.5°F	75°F	75°F
Design Specifics	Gaps	Gaps	Gaps	No Gaps?



Modeler	Code
S1	ANSYS Fluent
S2	STAR-CCM+
S3	COBRA
S4	ANSYS APDL



- HBU Demo Measurement results published in EPRI report 3002015076
- HBU Demo Blind Benchmarking Thermal Results published in EPRI report 3002013124
- Both reports are publicly available



# ESCP Modeling & Benchmarking Activities

# ESCP International Thermal Modeling Project



EPRI report, **3002018498**, provides a description of the benchmark:

- Based on publicly available information

• Includes a recording of the description  
EPRI report, **3002023976**, provides Phase I results

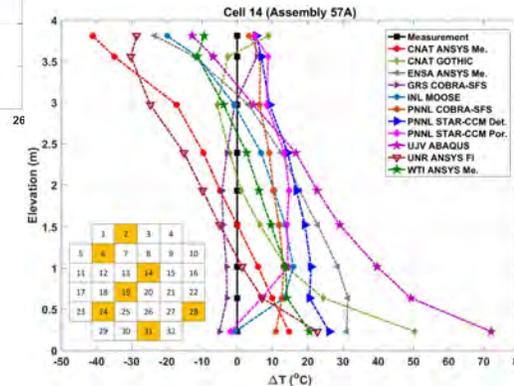
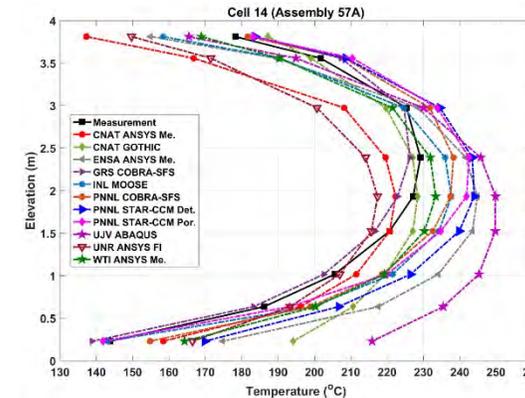
- Both reports are publicly available



## Observations:

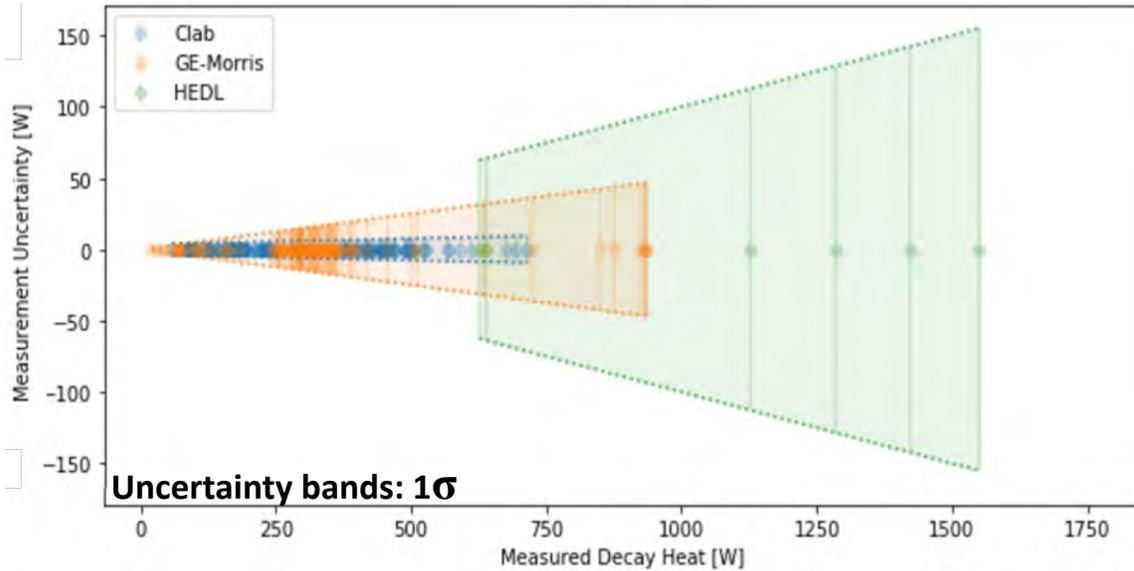
- Wide variation in temperature predictions
  - Between different codes
  - Between different organizations, using the same code
- No correlation between computational time, details of the model and accuracy of the results

Solution Method	Code(s)	Organization(s)
Finite Element Method (FEM)	ANSYS Mechanical	CNAT ENSA WTI
	ABAQUS	UJV
Finite Volume Method (FVM)	ANSYS Fluent	UNR
	GOTHIC	CNAT
	STAR-CCM	PNNL
Finite Difference Method (FDM)	COBRA-SFS	GRS PNNL
	MOOSE	INL

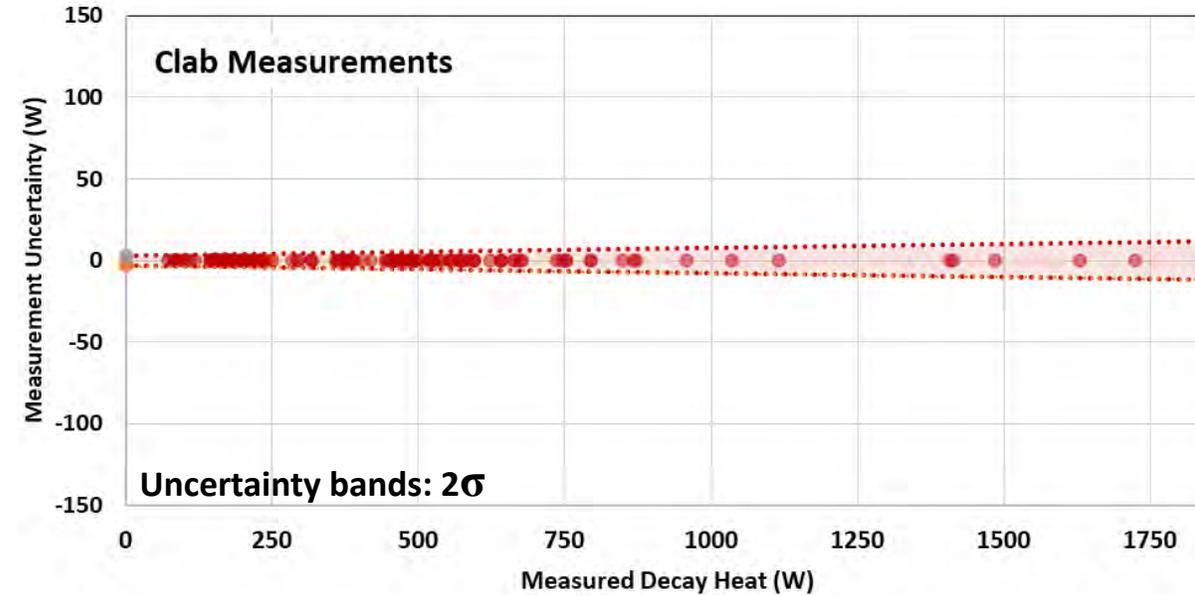


**Eight organizations from four countries using seven codes and 11 solutions with different solution approaches. Phase I is complete; Phase II is ongoing**

# Extending Validation Range for Decay Heat and Reducing Measurement Uncertainty



- **HEDL:** Large measurements uncertainty; no other measurements for high DH range → can't be taken out of validation set yet
- **GE-Morris:** Measurement quality issues at higher DH; no other measurements → can't be taken out of validation set yet
- **CLAB:** Low measurement uncertainty; focus on low DH

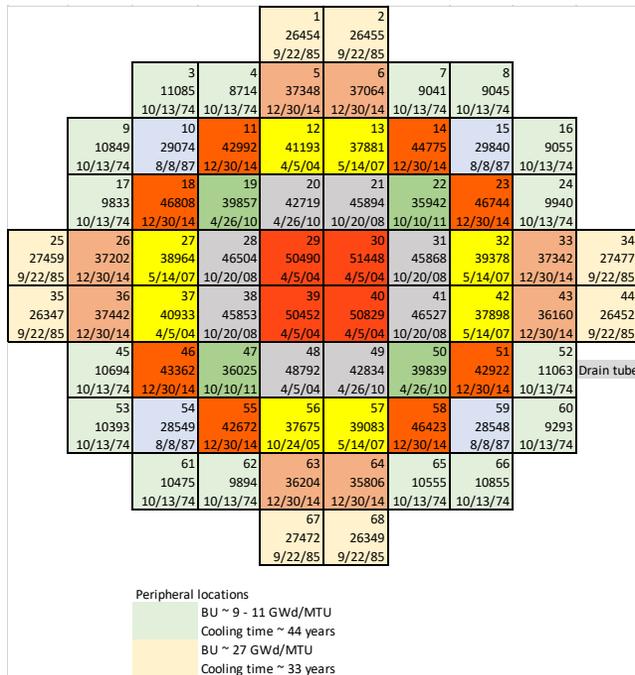


- Over 120 new DH measurements that are not published yet
- High quality data → better validation set → decrease DH uncertainty and increase margins for global industry

EPRI initiated a collaborative project with SKB to publish unpublished CLAB measurements; perform new measurements to close the gaps - **ESCP Decay Heat Task group members, and other interested collaborators, will perform review and participate in potential blind benchmark for new measurements**

# Radiation Dose Benchmarking

Radiation dose measurements from three loaded canisters are available from two sites for modeling



Benchmark description, based on publicly available documents, and assumptions will be provided to participants

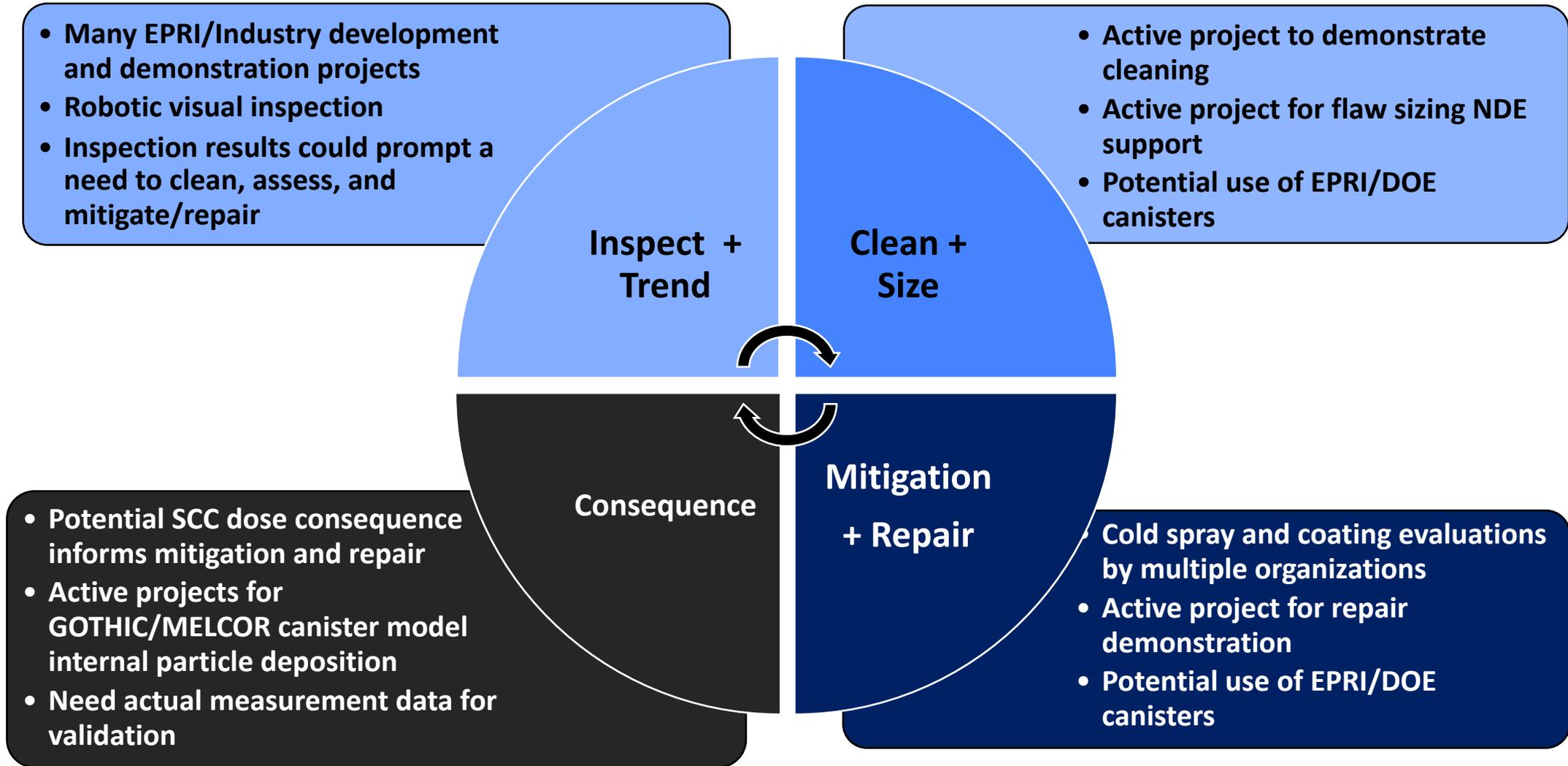
## Blind Benchmark

- EPRI will not release the measurement data until the completion of benchmark project
- Actively participating organizations:
  - USA: INL, ORNL, PNNL
  - Sweden: SKB
  - Japan: NMRI
  - Germany: GNS
  - Spain: ENSA
- Project kick-off meeting in February 2023
- Results will be published in a publicly available EPRI ESCP report



# ESCP Aging Management and Canister Integrity

# Canister Aging Management Research Activities



Many collaborative research activities to address current and potential future needs



# ESCP Focus Areas - Next 2-3 Years

# Forward Looking ESCP Focus Areas for Next 2-3 Years

## Fuel

- Phase II sister rod testing
- Transport of HBU Demo cask and opening
- Increased focus on ATF/HE/HBU and back-end effects
- Increased focus on Advanced Reactors and back-end issues

## Aging Management and Canister Integrity

- Mitigation and repair techniques development
- Demonstration via field tests
- Acceleration of consequence studies

## Modeling & Benchmarking

### Thermal:

- Completion of international thermal modeling project
- Gathering more benchmark data during inspections

### Dose:

- Blind benchmarking activity for dose modeling

### Decay Heat:

- Completion of decay heat reports
- New measurements and potential for blind benchmark

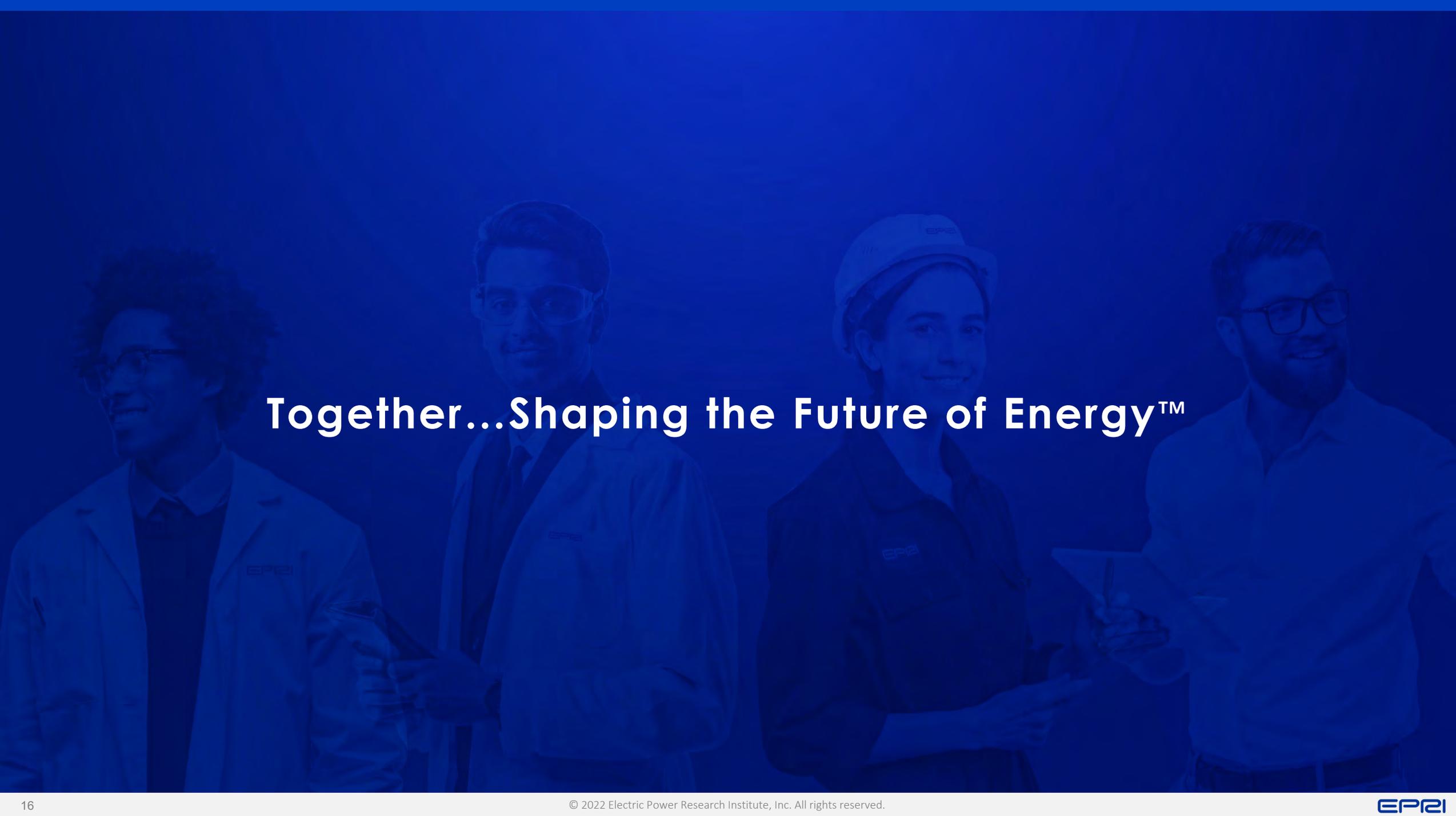
**Collaborative R&D to Inform and Transform**

# Summary

- ✓ ESCP is a forum that enables collaborative development of innovative solutions for spent fuel management
- ✓ Recent cooperative **R&D with DOE and NRC reduced dry storage and transportation concerns** of high burnup fuel
  - ✓ Research shows continued long-term storage of commercial spent fuel is **safe with larger performance margins**
- ✓ ESCP is continuing to enable the development of **improved aging management guidelines** with inspection, repair, and mitigation technologies as well as consequence analysis
- ✓ ESCP is increasing its activities in modeling and benchmarking, advanced fuels (ATF/HE/HBU), and advanced reactors areas.

**ESCP Winter 2023 Meeting**

October 23-26, 2023; Charlotte, NC

A blue-tinted photograph of four people, two men and two women, standing in a row. They are all wearing white lab coats or work shirts with the EPRI logo on the chest. The woman on the far right is wearing a white hard hat. They are all smiling and looking towards the right. The background is a solid blue color.

**Together...Shaping the Future of Energy™**