

**DAVIS-BESSE LESSONS LEARNED TASK FORCE
RECOMMENDATIONS REGARDING STRESS CORROSION CRACKING**

TAC No. MB2916	<u>Description</u> Non plant-specific activities for Bulletin 2001-01	Last Update: 09/30/04 Lead Division: DLPM
MB3567	VHP Action Plan (Coordination and Administration)	Supporting Divisions: DE, DSSA, DIPM, & DRIP
MB3954	Development of CRDM NUREGs (Bulletin 2001-01)	Supporting Offices: RES & Regions
MB4495	Lead PM Activities for Bulletin 2002-01	
MB4603	Non plant-specific activities for Bulletin 2002-01	
MB5465	Lead PM Activities for Bulletin 2002-02	
MB6218	Inspection TI for Bulletin 2002-02	
MB6220	Review of NEI/MRP Crack Growth Rate Report (MRP-55)	
MB6221	Development of Alternate (to ASME Code) RPV Head and VHP Inspection Requirements	
MB6222	Review of NEI/MRP RPV Head and VHP Inspection Plan (MRP-75)	
MB7182	Orders for Interim Inspection Guidelines	
MB9522	Review of Bulletin 2002-01 Responses	
MB8915	Generic Activities for Lower Head Inspection	
MB9891	Develop Bulletin 2003-02	
MC0590	Develop Technical Issues Related to Incorporating RCPB Inspection Requirements into 50.55a	
MC1036	Develop/Revise Inspection Guidance for ISI and BACC	

Milestone	Date (T=Target) (C=Complete)	Lead	Support
Part I - Reactor Pressure Vessel Head Inspection Requirements			
1. Collect and summarize information available worldwide on Alloy 600, Alloy 690 and other nickel based alloy nozzle cracking for use in evaluation of revised inspection requirements. [LLTF 3.1.1(1)-High]	03/04 (C) ML040920026	RES/DET	DE
2. Critically evaluate existing SCC models with respect to their continuing use in the susceptibility index. [LLTF 3.1.4(1)-Medium]	07/03 (C) ML032461221 ML032461224	RES/DET	DE

Milestone	Date (T=Target) (C=Complete)	Lead	Support
3. a. Complete initial evaluation of individual plant inspections in response to Bulletins and Orders. b. Continue to review future inspection results until permanent guidelines are issued.	05/04 (C) ML041560306 Ongoing	DE DE	DLPM Regions DLPM Regions
4. Incorporate Order EA-03-009 requirements into 10 CFR 50.55a 1. Develop technical basis 2. Develop rulemaking plan. 3. Commission decision	Note (2) 04/04 (C) ML040920628 ML040920638 07/04 (C) 08/04 (C) ML042190072	DE DRIP	DRIP DE
5. Monitor and provide input to industry efforts to develop revised RPV Head inspection requirements (ASME Code Section XI). [LLTF 3.3.4(8)-High]	TBD Note (1)	DE	RES/DET DSSA Regions Industry
6. Participate in meetings and establish communications with appropriate stakeholders (e.g., MRP, ASME). [LLTF 3.3.4(8)-High]	Ongoing	DE	RES/DET DLPM DRIP DSSA industry
7. Review and evaluate revised ASME Code requirements when issued. [LLTF 3.3.4(8)-High]	TBD Note (1)	DE	RES/DET
8. If revised ASME Code requirements are acceptable, establish schedule to incorporate by reference into 10 CFR 50.55a. [LLTF 3.3.4(8)-High]	TBD Note (1)	DE	DRIP DIPM DSSA RES/DET industry public
9. Publish a NUREG report summarizing findings from Part I, items 1 and 2, and Part II, item 1.	03/05 (T)	RES/DET	DE

Milestone	Date (T=Target) (C=Complete)	Lead	Support
10. Propose a course of action and implementation schedule to address the results of the analysis of Part I, item 1, and Part II, item 1. [LLTF 3.1.1(1)-High]	10/04 (T)	DE	RES/DET
Part II - Boric Acid Control			
1. Collect and summarize information available worldwide on boric acid corrosion of pressure boundary materials for use in evaluation of revised inspection requirements. [LLTF 3.1.1(1)-High]	10/04 (T)	RES/DET	DE
2. a. Evaluate individual plant responses to Bulletin 2002-01 regarding Boric Acid Inspection Programs (60-day responses and necessary follow-up) b. Issue public document to summarize evaluation of plant responses.	06/03 (C) ML031760568 07/03 (C) ML032100653	DE DE	DLPM DLPM DRIP
3. Participate in meetings and establish communications with appropriate stakeholders (e.g.,MRP, ASME).	Ongoing	DE	RES/DET DLPM DRIP DSSA industry
4. Evaluate need to take additional regulatory actions and determine appropriate regulatory tool(s).	06/03 (C) ML031760568	DE	DLPM DRIP DIPM DSSA Regions
5. Issue Bulletin 2003-02 on Reactor Vessel Lower Head inspection	08/03 (C) ML032320153	DE	DLPM
6. Develop milestones for additional regulatory actions, as necessary.	07/03 (C)	DE	DLPM DSSA DRIP
7. Complete and evaluate the results of ongoing research on materials degradation, engage external stakeholders and develop a plan to implement a proactive approach to manage degradation of the RCPB.	06/06 (T)	DE	RES

Milestone	Date (T=Target) (C=Complete)	Lead	Support
8. Review and evaluate the adequacy of revised ASME Code Requirements for Pressure Testing/Leakage Evaluation being developed by the ASME Code, Section XI, Task Group on Boric Acid .	01/05 (T) Note (1)	DE	RES/DET
Part III - Inspection Programs			
1. Develop inspection guidance or revise existing guidance to ensure that VHP nozzles and the RPV head area are periodically reviewed by the NRC during licensee ISI activities. [LLTF 3.3.4(3)-High]	06/04 (C)	DIPM	DE Regions
2. Develop inspection guidance that provides for timely, periodic inspection of PWR plant BACC programs. [LLTF3.3.2(1)-High]	06/04 (C)	DIPM	DE Regions
3. a. Develop inspection guidance for assessing the adequacy of PWR plant BACC programs (implementation effectiveness, ability to identify leakage, adequacy of evaluation of leaks). [LLTF 3.2.2(1)-High] b. Perform follow-up evaluation of inspection guidance and licensee program acceptability after conducting inspections for approximately one year.	06/04 (C) 05/05 (T)	DIPM DIPM	DE RES/DET Regions DE RES/DET Regions

Notes: (1) Milestone dates are dependent upon issuance of industry proposals.

(2) Requirements for inspection of only the upper head will be the subject of this rulemaking.

Description: The reactor vessel head (RVH) degradation found at Davis-Besse, along with other documented incidences of circumferential cracking of vessel head penetration (VHP) nozzles, have prompted the staff to question the adequacy of current RVH and VHP inspection programs that rely on visual examinations as the primary inspection method. Also, the failure to adequately address indications of boric acid leakage at Davis-Besse raised questions as to the efficacy of industry boric acid control (BACC) programs. Finally, review of the Davis-Besse event identified deficiencies in the NRC inspection programs.

Historical Background: In March 2002, while conducting inspections in response to Bulletin 2001-01, the Davis-Besse Nuclear Power Station identified three CRDM nozzles with indications of axial cracking, which were through-wall, and resulted in reactor coolant pressure boundary leakage. During the nozzle repair activities, a 7 inch by 4-to-5 inch cavity on the downhill side of nozzle 3, down to the stainless steel cladding was identified. The extent of the damage indicated that it occurred over an extended period and

that the licensee's programs to inspect the RPV head and to identify and correct boric acid leakage were ineffective.

One of the NRC follow-up actions to the Davis-Besse event was formation of a Lessons Learned Task Force (LLTF). The LLTF conducted an independent evaluation of the NRC's regulatory processes related to assuring reactor vessel head integrity in order to identify and recommend areas of improvement applicable to the NRC and the industry. A report summarizing their findings and recommendations was published on September 30, 2002. The report contains several consolidated lists of recommendations. The LLTF report was reviewed by a Review Team (RT), consisting of several senior management personnel appointed by the Executive Director for Operations (EDO). The RT issued a report on November 26, 2002, endorsing all but two of the LLTF recommendations, and placing them into four overarching groups. On January 3, 2003, the EDO issued a memo to the Director, NRR, and the Director, RES, tasking them with developing a plan for accomplishing the recommendations. This action plan addresses the recommendations in the "Assessment of Stress Cracking" grouping of the RT report. The LLTF recommendations are listed in the attached Table 1, and have been identified under the appropriate milestone(s).

Proposed Actions: The staff is interacting with all PWR licensees, the American Society of Mechanical Engineers (ASME), the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP), and other external stakeholders in addressing the issues discussed above. This action plan includes milestones aimed at guiding the NRC and industry to effectively manage RVH degradation and BACC. Throughout the implementation of this action plan, the NRC will establish the necessary communications mechanisms to ensure that the NRC, the industry, and all stakeholders are informed and sharing the same information. This will be accomplished through public meetings, technical working groups, ACRS briefings, and web site postings, as appropriate.

The Part I milestones deal with development of improved inspection requirements for the RPV head and VHP nozzles. Interim inspection guidelines for the RPV upper head have been issued via Order EA-03-009 and associated temporary inspection guidelines (TI-150) have been issued for use by NRC inspectors. These will be updated as needed based on inspection results. The staff will monitor and assess the adequacy of revisions to the ASME Boiler and Pressure Vessel Code regarding RPV head inspection, which will be based on the inspection program developed by the EPRI MRP. If the revised ASME Code requirements are acceptable, based on the staff's technical evaluations, the NRC will initiate action to incorporate them by reference in a revision to 10 CFR 50.55a.

The Part II milestones evaluate whether industry BACC programs are meeting NRC expectations and whether additional inspection guidance should be issued. First, the staff will establish a technical basis for BACC program requirements through ongoing and planned research programs. This will include evaluation of boric acid events in past reports and in responses to Bulletin 2002-01, and studies of rates of reactor pressure boundary materials in boric acid solutions. The staff is also monitoring development of revised ASME Code requirements by the Section XI Task Group on Boric Acid. If the staff determines that additional interim guidelines are needed prior to issuance of the revised Code requirements, they will be issued by an appropriate regulatory tool. When the ASME Code requirements are revised, the NRC will initiate action to endorse them, if acceptable. If the revised ASME code requirements cannot be made acceptable to the NRC, then alternate requirements would have to be developed and implemented by an appropriate regulatory tool. Based on the leaks discovered in lower vessel head penetrations at South Texas Project, the staff issued Bulletin 2003-02 regarding RPV lower head inspections. Associated temporary inspection guidelines (TI-152) were issued for use by NRC inspectors. The staff will complete and evaluate the results of ongoing research on materials degradation, engage external stakeholders and develop a plan to implement a proactive approach to manage degradation of the RCPB.

The Part III milestones address the LLTF findings that the NRC inspection guidelines did not provide effective oversight of licensee RPV head inspection and BACC programs. Revised guidelines for these activities will be developed. Throughout the process of establishing new requirements, existing NRC inspection procedures would be evaluated to verify whether they adequately address the revised requirements, and would be updated as needed.

Originating Documents:

Memorandum from Travers, W.D. to Collins, S. and Thadani, A. C., dated January 3, 2003, "Actions Resulting From The Davis-Besse Lessons Learned Task Force Report Recommendations." (ADAMS Accession No. ML023640431)

Memorandum from Paperiello, C.J. to Travers, W.D., dated November 26, 2002, "Senior Management Review of the Lessons-Learned Report of the Davis-Besse Nuclear Power Station Reactor Pressure Vessel Head." (ADAMS Accession No. ML023260433)

Memorandum from Howell, A.T. to Kane, W.F., dated September 30, 2002, "Degradation of the Davis-Besse Nuclear Power Station Reactor Pressure Vessel Head Lessons-Learned Report." (ADAMS Accession No. ML022740211)

Regulatory Assessment: The current method for managing PWSCC in the VHP nozzles of U.S. PWRs is dependent on the implementation of inspection methods intended to provide early detection of degradation of the reactor coolant pressure boundary. Title 10, Section 50.55a(g)(4) of the *Code of Federal Regulations* requires, in part, that ASME Code Class 1, 2, and 3 components must meet the inservice inspection requirements of Section XI of the ASME Boiler and Pressure Vessel Code throughout the service life of a boiling or pressurized water reactor. Pursuant to Inspection Category B-P of Table IWB-2500-1 to Section XI of the ASME Boiler and Pressure Vessel Code, licensees are required to perform VT-2 visual examinations of their vessel head penetration nozzles and reactor vessel heads once every refueling outage for the system leak tests, and once an inspection interval for the hydrostatic pressure test.

Based on the experience with the VHP nozzle cracking phenomenon, the VT-2 visual examination methods required by the ASME Code for inspections of VHP nozzles do not provide reasonable assurance that leakage from a through-wall flaw in a nozzle will be detected. The VT-2 visual examination methods specified by the ASME Code are not directed at detecting the very small amounts of boric acid deposits, e.g., on the order of a few grams, that have been associated with VHP nozzle leaks in operating plants. In addition, the location of thermal insulating materials and physical obstructions may prevent the VT-2 visual examination methods from identifying minute amounts of boric acid deposits on the outer surface of the vessel head. Specifically, Paragraph IWA-5242 of Section XI of the ASME Boiler and Pressure Vessel Code does not require licensees to remove thermal insulation materials when performing ASME VT-2 visual examinations of reactor vessel heads. Cleanliness of reactor vessel heads during the examinations, which is critical for visual examination methods to be capable of distinguishing between boric acid residues that result from VHP nozzle leaks and those residues that result from leaks in other reactor coolant system components, is not addressed by the ASME Code.

Based on knowledge obtained from evaluation of the Davis-Besse event, and information provided from PWR licensees in response to Bulletins 2001-01, 2002-01 and 2002-02, the NRC issued an Order to all PWR plants establishing enhanced inspection requirements on an interim basis, which will provide adequate assurance of safe plant operation until permanent requirements are established and promulgated.

Current Status: Part I activities included continued monitoring of outage inspection results, follow-up with plants discovering defects, and evaluation of requests for relaxation from First Revised Order EA-03-009.

The staff evaluated the existing SCC models and determined that they are acceptable for use in prioritizing RPV head inspections.

The staff collected information on Alloy 600, Alloy 690 and other nickel-based alloy nozzle cracking and issued a summary report for internal use.

The staff developed a rule plan to incorporate the inspection requirements for the RPV upper head into 10 CFR 50.55a. This was submitted for Commission approval in July 2004. The Commission decided not to proceed with this rulemaking and directed the staff to continue to work with the industry to incorporate revised inspection requirements into the ASME code (SRM-SECY-04-0115, August 6, 2004).

In Part II activities, the review and evaluation of licensee responses to Bulletin 2002-01 regarding BACC have been completed. A summary of the evaluation was published in RIS 2003-13. Based on this review and the discovery of leakage on under vessel penetrations at South Texas Project, Bulletin 2003-02 was issued.

The staff has produced a draft report, which is being reviewed, on available worldwide operating experience on boric acid corrosion of pressure boundary materials. Following internal review, this information and the information previously collected on nozzle cracking will be issued in a NUREG. The NUREG will also include the staff evaluation of the SCC models.

Using the information collected on boric acid corrosion and the information previously collected regarding Alloy 600, Alloy 690 and other nickel-based alloy nozzle cracking, the staff is also considering a proposed course of action and an implementation schedule to address LLTF 3.1.1(1).

In Part III activities, inspection procedure revisions addressing RPV head inspection and boric acid corrosion control programs were issued.

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References:

First Revised Order EA-03-009 establishing interim inspection requirements for reactor pressure vessel heads at pressurized water reactors, February 20, 2004.

NRC Bulletin 2003-02, "Leakage From Reactor Pressure Vessel Lower Head Penetrations And Reactor Coolant Pressure Boundary Integrity," August 21, 2003.

NRC Regulatory Issue Summary 2003-13, "NRC Review of Responses to Bulletin 2002-01."

Order EA-03-009 establishing interim inspection requirements for reactor pressure vessel heads at pressurized water reactors, February 11, 2003.

NRC Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs," August 9, 2002.

NRC Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity," March 18, 2002.

Information Notice 2002-11, "Recent Experience With Degradation of Reactor Pressure Vessel Head," March 12, 2002.

NRC Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," August 3, 2001.

Information Notice 2001-05, "Through-Wall Circumferential Cracking of Reactor Pressure Vessel Head Control Rod Drive Mechanism Penetration Nozzles at Oconee Nuclear Station, Unit 3," April 30, 2001.

Generic Letter 97-01, "Degradation of Control Rod Drive Mechanism Nozzle and Other Vessel Closure Head Penetrations," April 1, 1997.

Information Notice 96-11, "Ingress of Demineralizer Resins Increases Potential for Stress Cracking of Control Rod Drive Mechanism Penetrations," February 14, 1996.

NUREG/CR-6245, "Assessment of Pressurized Water Reactor Control Rod Drive Mechanism Nozzle Cracking," October 1994.

Letter from Russell, W. T., (USNRC) to Rasin, W., (Nuclear Management and Resources Council), dated November 19, 1993, "Safety Evaluation for Potential Reactor Vessel Head Adaptor Tube Cracking."

Information Notice 90-10, "Primary Water Stress Cracking of INCONEL 600," February 23, 1990.

Generic Letter 88-05, "Boric Acid of Carbon Steel Reactor Pressure Boundary Components in PWR Plants," March 17, 1988.

Table 1
LLTF Report Recommendations Included in SCC Action Plan

High Priority

NUMBER	RECOMMENDATION
3.1.1(1)	The NRC should assemble foreign and domestic information concerning Alloy 600 (and other nickel based alloys) nozzle cracking and boric acid from technical studies, previous related generic communications, industry guidance, and operational events. Following an analysis of nickel based alloy nozzle susceptibility to stress cracking (SCC), including other susceptible components, and boric acid of carbon steel, the NRC should propose a course of action and an implementation schedule to address the results.
3.2.2(1)	The NRC should inspect the adequacy of PWR plant boric acid control programs, including their implementation effectiveness, to determine their acceptability for the identification of boric acid leakage, and their acceptability to ensure that adequate evaluations are performed for identified boric acid leaks.
3.3.2(1)	The NRC should develop inspection guidance for the periodic inspection of PWR plant boric acid control programs.
3.3.4(3)	The NRC should strengthen its inspection guidance or revise existing guidance, such as IP 71111.08, to ensure that VHP nozzles and the RPV head area are periodically reviewed by the NRC during licensee ISI activities. Such NRC inspections could be accomplished by direct observation, remote video observation, or by the review of videotapes. General guidance pertaining to boric acid observations should be included in IP 7111.08
3.3.4(8)	The NRC should encourage ASME Code requirement changes for bare metal inspections of nickel based alloy nozzles for which the code does not require the removal of insulation for inspections. The NRC should also encourage ASME Code requirement changes for the conduct of non-visual NDE inspections of VHP nozzles. Alternatively, the NRC should revise 10 CFR 50.55a to address these areas.

Medium Priority

NUMBER	RECOMMENDATION
3.1.4(1)	The NRC should determine if it is appropriate to continue using the existing SCC models as predictors of VHP nozzle PWSCC susceptibility given the apparent large uncertainties associated with the models. The NRC should determine whether additional analysis and testing are needed to reduce uncertainties in these models relative to their continued application in regulatory decision making.

Low Priority

NUMBER	RECOMMENDATION
3.3.7(6)	Determine whether ISI summary reports should be submitted to the NRC, and revise the ASME submission requirement and staff guidance regarding disposition of the reports, as appropriate.