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### EDF AND AREVA UK EPR GENERIC DESIGN ASSESSMENT GDA ISSUE

# STRUCTURAL INTEGRITY – AVOIDANCE OF FRACTURE GI-UKEPR-SI-01 REVISION 2

| Technical Area          |   | STRUCTURAL INTEGRITY   |                               |                     |  |
|-------------------------|---|--|-------------------------------|---------------------|--|
| Related Technical Areas |   |  | None                          |                     |  |
| GDA Issue<br>Reference  | GI-UKEPR-SI-01  |  | GDA Issue Action<br>Reference | GI-UKEPR-SI-01.A1   |  |
| GDA Issue               | Avoidance of Fracture - Margins Based on Size of Crack-Like Defects.  |  |                               | Crack-Like Defects. |  |
|                         | Demonstration of defect tolerance and the absence of planar defects in the High Integrity Components (HICs) which requires integration of qualified non-destructive examinations during manufacture and analyses for limiting sizes of crack-like defects using conservative material fracture toughness properties.  |  |                               |                     |  |
| GDA Issue<br>Action     | Support assessment of the fracture analysis approach by providing adequate responses to any questions arising from assessment by ONR of documents submitted during GDA Step 4 but not reviewed in detail at that time.  |  |                               |                     |  |
|                         | A number of fracture assessment reports arrived later in the Step 4 assessment timeframe than had been originally planned. As a result ONR has been unable to undertake a full assessment of all the fracture assessment reports within the timescales allowed for GDA Step 4, but has undertaken a high level review of the reports where a full assessment was not possible in order to gain confidence in the approach. This GDA Issue Action has been created to support the full assessment of the reports not yet fully assessed. |  |                               |                     |  |
|                         | EDF and AREVA should:   |  |                               |                     |  |
|                         |   | uate responses to questions arising from the ONR assessment of<br>ng to this subject submitted during GDA Step 4 but not yet fully |                               |                     |  |
|                         | With agreement from the Regulator this action may be completed by alternative means.  |  |                               |                     |  |

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| Technical Area          |   | STRUCTURAL INTEGRITY  |   |                   |  |  |
|-------------------------|---|---|---|-------------------|--|--|
| Related Technical Areas |   | None  |   |                   |  |  |
| GDA Issue<br>Reference  | GI-UKEPR-SI-  | GI-UKEPR-SI-01  |   | GI-UKEPR-SI-01.A2 |  |  |
| GDA Issue<br>Action     | Provide an improved definition and evidence of capability of manufacturing inspection techniques for the austenitic and dissimilar metal welds. Provide more detail of the NDT methods proposed for certain components and provide additional evidence that these are likely to be capable of detecting defects smaller by some margin than the calculated limiting defect sizes (e.g. a target margin of 2). This evidence must include confirmation that the design of components facilitates an adequate inspection. |   |   |                   |  |  |
|                         | the evidence require  | igh level review of the latest proposals from EDF and AREVA has identified gaps in evidence required. Although two alternative ultrasonic inspection techniques are bosed, EDF and AREVA should provide the following information for at least one of se options: |   |                   |  |  |
|                         |   | <ul> <li>Evidence that the ultrasonic beams selected are able to detect defects<br/>structural concern including those in the planes of the weld fusion faces over th<br/>full extent;</li> </ul>   |   |                   |  |  |
|                         | <ul> <li>Evidence that the design is such that there are no significant reinspection from features such as counterbores, changes of sectio tapered or curved surfaces, error of form etc;</li> </ul>  |   |   |                   |  |  |
|                         | procedures a  | <ul> <li>Evidence that, when fully developed, the ultrasonic detection and characterisation<br/>procedures are likely to have adequate capability for the expected sizes of the<br/>defects to be qualified.</li> </ul>   |   |                   |  |  |
|                         |   |   | es to questions arising from ONR assessment of documents ect whether submitted already or as a result of the Resolution |                   |  |  |
|                         | With agreement from   | With agreement from the Regulator this action may be completed by alternative means.  |   |                   |  |  |

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| Technical Area          |  | STRUCTURAL INTEGRITY   |  |  |  |
|-------------------------|--|--|--|--|--|
| Related Technical Areas |  | None   |  |  |  |
| GDA Issue<br>Reference  | GI-UKEPR-SI-   | GI-UKEPR-SI-01   |  | GI-UKEPR-SI-01.A3  |  |
| GDA Issue<br>Action     | Provide additional evidence of capability for the main steam line welds. Provide more detail of the NDT methods proposed for certain components and provide additional evidence that these are likely to be capable of detecting defects smaller by some margin than the calculated limiting defect sizes (e.g. a target margin of 2). This evidence must include confirmation that the design of components facilitates an adequate inspection. |  |  |  |  |
|                         | A high level review of the latest proposals from EDF and AREVA has identified gaps in the evidence required and as a result EDF and AREVA should provide:  |  |  |  |  |
|                         | <ul> <li>Confirmation that the weld preparation angles are such that near-specula<br/>reflection is achievable over the full height of all welds.</li> </ul>   |  |  |  |  |
|                         |  | inspection (tapered or curved surfaces, counterbores, error of form etc) are |  |  |  |
|                         | procedures a   |  |  |  |  |
|                         |  | s subject  |  | m ONR assessment of documents ady or as a result of the Resolution |  |
|                         | With agreement from the Regulator this action may be completed by alternative means.   |  |  |  |  |

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# STRUCTURAL INTEGRITY – AVOIDANCE OF FRACTURE GI-UKEPR-SI-01 REVISION 2

| Areas   |   |   | STRUCTURAL INTEGRITY  |  |  |
|---|---|---|---|--|--|
|   | None  |   |   |  |  |
| GI-UKEPR-SI-01  |   | GDA Issue Action<br>Reference   | GI-UKEPR-SI-01.A4   |  |  |
| Provide an improved definition of techniques and evidence of capability for inspection of repair welds in RCP casings. Provide more detail of the NDT methods proposed for certain components and provide additional evidence that these are likely to be capable of detecting defects smaller by some margin than the calculated limiting defect sizes (e.g. a target margin of 2). This evidence must include confirmation that the design of components facilitates an adequate inspection.  A high level review of the latest proposals from EDF and AREVA has identified gaps in                         |   |   |   |  |  |
| <ul> <li>Submission of the detailed results from the inspection trials on the mock-up.</li> <li>Evidence that, in addition to minimising the risk of any welding defects, the design of excavations for weld repairs will also take account of the need for NDT and particularly the need to ensure that the ultrasonic beams selected can achieve favourable angles of incidence on the fusion faces.</li> <li>Adequate responses to questions arising from ONR assessment of documents relating to this subject whether submitted already or as a result of the Resolution Plan for this Action.</li> </ul> |   |   |   |  |  |
| eleac   | rovide an improved of pair welds in RCP ertain components are etecting defects smalarget margin of 2). Imponents facilitates high level review of e evidence required.  Submission of Evidence that, of excavations particularly the favourable and Adequate respondents for this Adequate respondents. | rovide an improved definition repair welds in RCP casings. Pertain components and provide etecting defects smaller by so reget margin of 2). This expendence facilitates an adect high level review of the late evidence required. Activitie  Submission of the deta  Evidence that, in additi of excavations for well particularly the need to favourable angles of in  Adequate responses to relating to this subject Plan for this Action. | rovide an improved definition of techniques and evid apair welds in RCP casings. Provide more detail of the ertain components and provide additional evidence the etecting defects smaller by some margin than the cal arget margin of 2). This evidence must include omponents facilitates an adequate inspection.  high level review of the latest proposals from EDF e evidence required. Activities by EDF and AREVA sleeping to the detailed results from the inspection of the detailed results from the inspection of excavations for weld repairs will also take particularly the need to ensure that the ultrast favourable angles of incidence on the fusion factorized. Adequate responses to questions arising from relating to this subject whether submitted already. |  |  |

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| Technical Area          |  | STRUCTURAL INTEGRITY   |                               |  |
|-------------------------|--|--|-------------------------------|--|
| Related Technical Areas |  | None   |                               |  |
| GDA Issue<br>Reference  | GI-UKEPR-SI-01   |  | GDA Issue Action<br>Reference | GI-UKEPR-SI-01.A5  |
| GDA Issue<br>Action     | Provide evidence justifying the manufacturing inspections of the RCP flywheel and the principles of ISI. Provide more detail of the NDT methods proposed for certain components and provide additional evidence that these are likely to be capable of detecting defects smaller by some margin than the calculated limiting defect sizes (e.g. a target margin of 2). This evidence must include confirmation that the design of components facilitates an adequate inspection. |  |                               |  |
|                         | A high level review of the latest proposals from EDF and AREVA has identified gaps in the evidence required. Activities by EDF and AREVA should comprise:  |  |                               |  |
|                         | <ul> <li>Justification of the maximum overspeed used to derive the limiting defect size are<br/>an analysis of potential in-service initiation or growth.</li> </ul>   |  |                               |  |
|                         | defects of co<br>from the oute<br>holes do not   | Evidence that the manufacturing inspections adequately cover all plausib defects of concern: e.g. this should include evidence that ultrasonic inspection from the outer curved surface of the plates is not required, that the inspection holes do not require inspection during manufacture, and that the ultrasonic arpenetrant inspections have the required capability. |                               |  |
|                         | <ul> <li>Justification of any ISI proposed in comparison with that required by U<br/>Reg. Guide 1.14.</li> </ul>   |  |                               | on with that required by US NRC                                    |
|                         |  | subject  |                               | m ONR assessment of documents ady or as a result of the Resolution |
|                         | With agreement from the Regulator this action may be completed by alternative means.   |  |                               |  |

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| Technical Area          |  | STRUCTURAL INTEGRITY   |   |  |  |
|-------------------------|--|--|---|--|--|
| Related Technical Areas |  | None   |   |  |  |
| GDA Issue<br>Reference  | GI-UKEPR-SI-   | GDA Issu<br>Refer  |   | GI-UKEPR-SI-01.A6  |  |
| GDA Issue<br>Action     | Provide additional evidence to support the technical justification of the prototype application. Provide more detail of the NDT methods proposed for certain components and provide additional evidence that these are likely to be capable of detecting defects smaller by some margin than the calculated limiting defect sizes (e.g. a target margin of 2). This evidence must include confirmation that the design of components facilitates an adequate inspection. |  |   |  |  |
|                         | EDF and AREVA sho  | uld provide:   |   |  |  |
|                         | the 'worst cas   | An explanation of how the defects proposed in the test piece will take into account the 'worst case defects' and will be sufficient to test the weaknesses identified in the inspection procedure. |   |  |  |
|                         |  | An explanation of how the effects of the cladding (e.g. anisotropy, unever interface with parent material) on the inspection capability will be taken into account,                                |   |  |  |
|                         |  | Quantification of the maximum surface profile variations (error of form) on surfaces of the weld and cladding and justification of its acceptability.  |   |  |  |
|                         | <ul> <li>Clarification of checked.</li> </ul>  | f how surface profile  | how surface profile variations (error of form) are controlled |  |  |
|                         |  | <ul> <li>Clarification of the capability likely to be achieved using the flow<br/>characterisation.</li> </ul>   |   |  |  |
|                         |  | subject whether sub  |   | m ONR assessment of documents ady or as a result of the Resolution |  |
|                         | With agreement from the Regulator this action may be completed by alternative means.   |  |   | completed by alternative means.                                    |  |

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| Technical Area          |   | STRUCTURAL INTEGRITY   |                               |                   |  |
|-------------------------|---|--|-------------------------------|-------------------|--|
| Related Technical Areas |   | None   |                               |                   |  |
| GDA Issue<br>Reference  | GI-UKEPR-SI-01  |  | GDA Issue Action<br>Reference | GI-UKEPR-SI-01.A7 |  |
| GDA Issue<br>Action     | Provide additional evidence to confirm design and accessibility for in-service inspection (ISI). Provide more detail of the NDT methods proposed for certain components and provide additional evidence that these are likely to be capable of detecting defects smaller by some margin than the calculated limiting defect sizes (e.g. a target margin of 2). This evidence must include confirmation that the design of components facilitates an adequate inspection.  EDF and AREVA should provide: |  |                               |                   |  |
|                         | <ul> <li>A systematic review of the locations proposed for ISI to confirm that, as well as<br/>being physically accessible, the design of all the HIC pipework welds facilitates<br/>inspections likely to have the required capability and that there are no undue<br/>restrictions from any local design features such as counterbores or tapered<br/>surfaces.</li> </ul>  |  |                               |                   |  |
|                         | relating to this  | <ul> <li>Adequate responses to questions arising from ONR assessment of documents<br/>relating to this subject whether submitted already or as a result of the Resolution<br/>Plan for this Action.</li> </ul> |                               |                   |  |
|                         | With agreement from the Regulator this action may be completed by alternative means.  |  |                               |                   |  |

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