ATTACHMENT

Revised Pages for Proposed License Amendment and Technical Specification Changes for Quad-Cities Unit 2

DPR-30 License

Page 4

Appendix A
Page #

1.0-4
1.1/2.1-2
1.1/2.1-3
1.1/2.1-4
1.1/2.1-8
1.1/2.1-9
1.2/2.2-2
1.2/2.2-3
3.1/4.1-1
3.3/4.3-9
3.3/4.3-10
3.5/4.5-9
3.5/4.5-10

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3. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below

A. Maximum Power Level

Commonwealth Edison is authorized to operate Quad-Cities Unit No. 2 at power levels not in excess of 2511 megawatts (thermal).

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 47, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3.C Restrictions

Am. 43 3/8/78 Operation in the coastdown mode is permitted to 40% power. Should off-normal feedwater heating be necessary for extended periods during coastdown (i.e., greater than 24 hours) the Licensee shall perform a safety evaluation to determine if the MCPR Operating Limit and calculated peak pressure for the worst case abnormal operating transient remain bounding for the new condition.

D. Equalizer Valve Restriction

Am. 12 4/21/75 The valves in the equalizer piping between the recirculation loops shall be closed at all times during reactor operation.

E. Security Plan

Am. 48 2/23/79 The licensee shall maintain in effect and fully implement all provisions of the Commission-approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p). The approved security plan consists of documents withheld from public disclosure pursuant to 10 CFR 2.790(d), referred to as Quad Cities Nuclear Power Station Units Nos. 1 and 2 Physical Security Plan dated as follows:

Plan - November 18, 1977
Revision 1 - May 19, 1978
Revision 2 - May 27, 1978
Revision 3 - July 28, 1978

1252 016

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Y. **Shutdown** - The reactor is in a shutdown condition when the reactor mode switch is in the Shutdown position and no core alterations are being performed.

1. Hot Shutdown means conditions as above, with reactor coolant temperature greater than 212° F.
2. Cold Shutdown means conditions as above, with reactor coolant temperature equal to or less than 212° F.

Z. **Simulated Automatic Actuation** - Simulated automatic actuation means applying a simulated signal to the sensor to actuate the circuit in question.

BB. **Transition Boiling** - Transition boiling means the boiling regime between nucleate and film boiling. Transition boiling is the regime in which both nucleate and film boiling occur intermittently, with neither type being completely stable.

CC. **Critical Power Ratio (CPR)** - The critical power ratio is the ratio of that assembly power which causes some point in the assembly to experience transition boiling to the assembly power at the reactor condition of interest as calculated by application of the GEXL correlation (reference NEDO-10958).

DD. **Minimum Critical Power Ratio (MCPR)** - The minimum incore critical power ratio corresponding to the most limiting fuel assembly in the core.

EE. **Surveillance Interval** - Each surveillance requirement shall be performed within the specified surveillance interval with:

a. A maximum allowable extension not to exceed 25% of the surveillance interval.

b. A total maximum combined interval time for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

FF. Fraction of Limiting Power Density (FLPD) - The fraction of limiting power density is the ratio of the linear heat generation rate (LHGR) existing at a given location to the design LHGR for that bundle type.

GG. Maximum Fraction of Limiting Power Density (MFLPD) - The maximum fraction of limiting power density is the highest value existing in the core of the fraction of limiting power density (FLPD).

HH. Fraction of Rated Power (FRP) - The fraction of rated power is the ratio of core thermal power to rated thermal power of 2511 MWth.

D. Reactor Water Level (Shutdown Condition)

Whenever the reactor is in the shutdown condition with irradiated fuel in the reactor vessel, the water level shall not be less than that corresponding to 12 inches above the top of the active fuel* when it is seated in the core.

*Top of active fuel is defined to be 360 inches above vessel zero (See Bases 3.2).

Where:

FRP = fraction of rated thermal power (2511 MWt)

MFLPD = maximum fraction of limiting power density where the limiting power density for each bundle is the design linear heat generation rate for that bundle.

The ratio of FRP/MFLPD shall be set equal to 1.0 unless the actual operating value is less than 1.0 in which case the actual operating value will be used.

This adjustment may also be performed by increasing the APRM gain by the inverse ratio, MFLPD/FRP, which accomplishes the same degree of protection as reducing the trip setting by FRP/MFLPD.

2. APRM Flux Scram Trip Setting (Refueling or Startup and Hot Standby Mode)

   When the reactor mode switch is in the Refuel or Startup Hot Standby position, the APRM scram shall be set at less than or equal to 15% of rated neutron flux.

3. IRM Flux Scram Trip Setting

   The IRM flux scram setting shall be set at less than or equal to 120/125 of full scale.

4. When the reactor mode switch is in the startup or run position, the reactor shall not be operated in the natural circulation flow mode.

B. APRM Rod Block Setting

The APRM rod block setting shall be as shown in Figure 2.1-1 and shall be:

$$S \leq (.65W_D + 43)$$

1252 018

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The definitions used above for the APRM scram trip apply. In the event of operation with a maximum fraction limiting power density (MFLPD) greater than the fraction of rated power (FRP), the setting shall be modified as follows:

$$S \leq (.65W_D + 43) \quad \frac{FRP}{MFLPD}$$

The definitions used above for the APRM scram trip apply.

The ratio of FRP to MFLPD shall be set equal to 1.0 unless the actual operating value is less than 1.0, in which case the actual operating value will be used. This may also be performed by increasing the APRM gain by the inverse ratio, MFLPD/FRP, which accomplishes the same degree of protection as reducing the trip setting by FRP/MFLPD.

C. Reactor low water level scram setting shall be 144 inches above the top of the active fuel* at normal operating conditions.

D. Reactor low water level ECCS initiation shall be 84 inches (+4 inches / -0 inch) above the top of the active fuel* at normal operating conditions.

E. Turbine stop valve scram shall be ≤ 10% valve closure from full open.

F. Turbine control valve fast closure scram shall initiate upon actuation of the fast closure solenoid valves which trip the turbine control valves.

G. Main steamline isolation valve closure scram shall be ≤ 10% valve closure from full open.

H. Main steamline low pressure initiation of main steamline isolation valve closure shall be ≥ 850 psig.

*Top of active fuel is defined to be 360 inches above vessel zero (See Bases 3.2)

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1.1 SAFETY LIMIT BASIS

The fuel cladding integrity limit is set such that no calculated fuel damage would occur as a result of an abnormal operational transient. Because fuel damage is not directly observable, a step-back approach is used to establish a safety limit such that the minimum critical power ratio (MCPR) is no less than the fuel cladding integrity safety limit. MCPR > the fuel cladding integrity safety limit represents a conservative margin relative to the conditions required to maintain fuel cladding integrity.

The fuel cladding is one of the physical barriers which separate radioactive materials from the environs. The integrity of the cladding barrier is related to its relative freedom from perforations or cracking. Although some corrosion or use-related cracking may occur during the life of the cladding, fission product migration from this source is incrementally cumulative and continuously measurable. Fuel cladding perforations, however, can result from thermal stresses which occur from reactor operation significantly above design conditions and the protection system safety settings. While fission product migration from cladding perforation is just as measurable as that from use-related cracking, the thermally caused cladding perforations signal a threshold beyond which still greater thermal stresses may cause gross rather than incremental cladding deterioration. Therefore, the fuel cladding safety limit is defined with margin to the conditions which would produce onset of transition boiling (MCPR of 1.0). These conditions represent a significant departure from the condition intended by design for planned operation. Therefore, the fuel cladding integrity safety limit is established such that no calculated fuel damage is expected to occur as a result of an abnormal operational transient. Basis of the values derived for this safety limit for each fuel type is documented in Reference 1.

A. Reactor Pressure > 800 psig and Core Flow > 10% of Rated

Onset of transition boiling results in a decrease in heat transfer from the cladding and therefore elevated cladding temperature and the possibility of cladding failure. However, the existence of critical power, or boiling transition is not a directly observable parameter in an operating reactor. Therefore, the margin to boiling transition is calculated from plant operating parameters such as core power, core flow, feedwater temperature, and core power distribution. The margin for each fuel assembly is characterized by the critical power ratio (CPR), which is the ratio of the bundle power which would produce onset of transition boiling divided by the actual bundle power. The minimum value of this ratio for any bundle in the core is the minimum critical power ratio (MCPR). It is assumed that the plant operation is controlled to the nominal protective setponts via the instrumented variables (Figure 2.1-3).

The MCPR fuel cladding integrity safety limit has sufficient conservatism to assure that in the event of an abnormal operational transient initiated from the normal operating condition, more than 99.9% of the fuel rods in the core are expected to avoid boiling transition. The margin between MCPR of 1.0 (onset of transition boiling) and the safety limit, is derived from a detailed statistical analysis considering all of the uncertainties in monitoring the core operating state, including uncertainty in the boiling transition correlation (see e.g., Reference 1). Because the boiling transition correlation is based on a large quantity of full-scale data, there is a very high confidence that operation of a fuel assembly at the condition of MCPR = the fuel cladding integrity safety limit would not produce boiling transition.

However, if boiling transition were to occur, cladding perforation would not be expected. Cladding temperatures would increase to approximately 1100°F, which is below the perforation temperature of the cladding material. This has been verified by tests in the General Electric Test Reactor (GETR), where similar fuel operated above the critical heat flux for a significant period of time (30 minutes) without cladding perforation.

If reactor pressure should ever exceed 1400 psia during normal power operation (the limit of applicability of the boiling transition correlation), it would be assumed that the fuel cladding integrity safety limit has been violated.

In addition to the boiling transition limit (MCPR) operation is constrained to a maximum LHGR = 17.5 kw/ft for 7 x 7 fuel and 13.4kw/ft for all 8x8 fuel types. This constraint is established by Specification 3.5.J to provide adequate safety margin to 1% plastic strain for abnormal operating transients initiated from high power conditions. Specification 2.1.A.1 provides for equivalent safety margin for transients initiated from lower power conditions by adjusting the APRM flow-biased scram setting by the ratio of FRP/MFLPD.

1252 020

An increase in the APRM scram trip setting would decrease the margin present before the fuel cladding integrity safety limit is reached. The APRM scram trip setting was determined by an analysis of margins required to provide a reasonable range for maneuvering during operation. Reducing this operating margin would increase the frequency of spurious scrams, which have an adverse effect on reactor safety because of the resulting thermal stresses. Thus, the APRM scram trip setting was selected because it provides adequate margin for the fuel cladding integrity safety limit yet allows operating margin that reduces the possibility of unnecessary scrams.

The scram trip setting must be adjusted to ensure that the LHGR transient peak is not increased for any combination of maximum fraction of limiting power density (MFLPD) and reactor core thermal power. The scram setting is adjusted in accordance with the formula in Specification 2.1.A.1, when the MFLPD is greater than the fraction of rated power (FRP). The adjustment may be accomplished by increasing the APRM gain by the reciprocal of FRP/MFLPD. This provides the same degree of protection as reducing the trip setting by FRP/MFLPD by raising the initial APRM readings closer to the trip settings such that a scram would be received at the same point in a transient as if the trip settings had been reduced by $\frac{FRP}{MFLPD}$.

2. **APRM Flux Scram Trip Setting (Refuel or Startup/Hot Standby Mode)**

For operation in the Startup mode while the reactor is at low pressure, the APRM scram setting of 15% of rated power provides adequate thermal margin between the setpoint and the safety limit, 25% of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, temperature coefficients are small, and control rod patterns are constrained to be uniform by operating procedures backed up by the rod worth minimizer. Of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because the flux distribution associated with uniform rod withdrawals does not involve high local peaks, and because several rods must be moved to change power by a significant percentage of rated power, the rate of power rise is very slow. Generally, the heat flux is in near equilibrium with the fission rate. In an assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than 5% of rated power per minute, and the APRM system would be more than adequate to assure a scram before the power could exceed the safety limit. The 15% APRM scram remains active until the mode switch is placed in the Run position. This switch occurs when reactor pressure is greater than 850 psig.

3. **IRM Flux Scram Trip Setting**

The IRM system consists of eight chambers, four in each of the reactor protection system logic channels. The IRM is a 5-decade instrument which covers the range of power level between that covered by the SRM and the APRM. The 5 decades are broken down into 10 ranges, each being one-half a decade in size.

The IRM scram trip setting of 120 divisions is active in each range of the IRM. For example, if the instrument were on Range 1, the scram setting would be 120 divisions for that range; likewise, if the instrument were on Range 5, the scram would be 120 divisions on that range. Thus, as the IRM is ranged up to accommodate the increase in power level, the scram trip setting is also ranged up.

The most significant sources of reactivity change during the power increase are due to control rod withdrawl. In order to ensure that the IRM provides adequate protection against the single rod withdrawal error, a range of rod withdrawal accidents was analyzed. This analysis included starting the accident at various power levels. The most severe case involves an initial condition in which the reactor is just subcritical and the IRM system is not yet on scale.

Additional conservatism was taken in this analysis by assuming that the IRM channel closest to the withdrawn rod is bypassed. The results of this analysis show that the reactor is scrammed and peak power limited to 1% of rated power, thus maintaining MCPR above the fuel cladding integrity safety limit. Based on the above analysis, the IRM provides protection against local control rod withdrawal errors and continuous withdrawal of control rods in sequence and provides backup protection for the APRM.

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B. APRM Rod Block Trip Setting

Reactor power level may be varied by moving control rods or by varying the recirculation flow rate. The APRM system provides a control rod block to prevent gross rod withdrawal at constant recirculation flow rate to protect against grossly exceeding the MCPR Fuel Cladding Integrity Safety Limit. This rod block trip setting, which is automatically varied with recirculation loop flow rate, prevents an increase in the reactor power level to excessive values due to control rod withdrawal. The flow variable trip setting provides substantial margin from fuel damage, assuming a steady-state operation at the trip setting, over the entire recirculation flow range. The margin to the safety limit increases as the flow decreases for the specified trip setting versus flow relationship; therefore the worst-case MCPR which could occur during steady-state operation is at 108% of rated thermal power because of the APRM rod block trip setting. The actual power distribution in the core is established by specified control rod sequences and is monitored continuously by the incore LPRM system. As with APRM scram trip setting, the APRM rod block trip setting is adjusted downward if the maximum fraction of limiting power density exceeds the fraction of rated power, thus preserving the APRM rod block safety margin. As with the scram setting, this may be accomplished by adjusting the APRM gains.

C. Reactor Low Water Level Scram

The reactor low water level scram is set at a point which will assure that the water level used in the bases for the safety limit is maintained. The scram setpoint is based on normal operating temperature and pressure conditions because the level instrumentation is density compensated.

D. Reactor Low Low Water Level ECCS Initiation Trip Point

The emergency core cooling subsystems are designed to provide sufficient cooling to the core to dissipate the energy associated with the loss-of-coolant accident and to limit fuel cladding temperature to well below the cladding melting temperature to assure that core geometry remains intact and to limit any cladding metal-water reaction to less than 1%. To accomplish their intended function, the capacity of each emergency core cooling system component was established based on the reactor low water level scram setpoint. To lower the setpoint of the low water level scram would increase the capacity requirement for each of the ECCS components. Thus, the reactor vessel low water level scram was set low enough to permit margin for operation, yet will not be set lower because of ECCS capacity requirements.

The design of the ECCS components to meet the above criteria was dependent on three previously set parameters: the maximum break size, the low water level scram setpoint, and the ECCS initiation setpoint. To lower the setpoint for initiation of the ECCS could lead to a loss of effective core cooling. To raise the ECCS initiation setpoint would be in a safe direction, but it would reduce the margin established to prevent actuation of the ECCS during normal operation or during normally expected transients.

E. Turbine Stop Valve Scram

The turbine stop valve closure scram trip anticipates the pressure, neutron flux, and heat flux increase that could result from rapid closure of the turbine stop valves. With a scram trip setting of 10% of valve closure from full open, the resultant increase in surface heat flux is limited such that MCPR remains above the MCPR fuel cladding integrity safety limit even during the worst-case transient that assumes the turbine bypass is closed.

F. Turbine Control Valve Fast Closure Scram

The turbine control valve fast closure scram is provided to anticipate the rapid increase in pressure and neutron flux resulting from fast closure of the turbine control valves due to a load rejection and subsequent failure of the bypass, i.e., it prevents MCPR from becoming less than the MCPR fuel cladding integrity safety limit for this transient. For the load rejection without bypass transient from 100% power, the peak heat flux (and therefore LHGR) increases on the order of 15% which provides wide margin to the value corresponding to 1% plastic strain of the cladding.

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1.2 SAFETY LIMIT BASES

The reactor coolant system integrity is an important barrier in the prevention of uncontrolled release of fission products. It is essential that the integrity of this system be protected by establishing a pressure limit to be observed for all operating conditions and whenever there is irradiated fuel in the reactor vessel.

The pressure safety limit of 1325 psig as measured by the vessel steam space pressure indicator is equivalent to 1375 psig at the lowest elevation of the reactor coolant system. The 1375 psig value is derived from the design pressures of the reactor pressure vessel and coolant system piping. The respective design pressures are 1250 psig at 575° F and 1175 psig at 560° F. The pressure safety limit was chosen as the lower of the pressure transients permitted by the applicable design codes: ASME Boiler and Pressure Vessel Code Section III for the pressure vessel, and USASI B31.1 Code for the reactor coolant system piping. The ASME Boiler and Pressure Vessel Code permits pressure transients up to 10% over design pressure (110% x 1250 = 1375 psig), and the USASI Code permits pressure transients up to 20% over the design pressure (120% x 1175 = 1410 psig). The safety limit pressure of 1375 psig is referenced to the lowest elevation of the primary coolant system. Evaluation methodology used to assure that this safety limit pressure is not exceeded for any reload is documented in Reference 1.

The design basis for the reactor pressure vessel makes evident the substantial margin of protection against failure at the safety pressure limit of 1375 psig. The vessel has been designed for a general membrane stress no greater than 26,700 psi at an internal pressure of 1250 psig; this is a factor of 1.5 below the yield strength of 40,100 psi at 575° F. At the pressure limit of 1375 psig, the general membrane stress will only be 29,400 psi, still safely below the yield strength.

The relationships of stress levels to yield strength are comparable for the primary system piping and provide a similar margin of protection at the established safety pressure limit.

The normal operating pressure of the reactor coolant system is 1000 psig. For the turbine trip or loss of electrical load transients, the turbine trip scram or generator load rejection scram together with the turbine bypass system limits the pressure to approximately 1100 psig (References 2, 3 and 4). In addition, pressure relief valves have been provided to reduce the probability of the safety valves operating in the event that the turbine bypass should fa

Finally, the safety valves are sized to keep the reactor coolant system pressure below 1375 psig with no credit taken for relief valves during the postulated full closure of all MSIVs without direct (valve position switch) scram. Credit is taken for the neutron flux scram, however.

The indirect flux scram and safety valve actuation, provide adequate margin below the peak allowable vessel pressure of 1375 psig.

Reactor pressure is continuously monitored in the control room during operation on a 1500 psi full-scale pressure recorder.

References

1. "Generic Reload Fuel Application", NEDE-24011-P-A*

2. SAR, Section 11.22

3. Quad Cities 1 Nuclear Power Station first reload license submittal, Section 6.2.4.2, February 1974.

4. GE Topical Report NEDO-20693, General Electric Boiling Water Reactor No. 1 licensing submittal for Quad Cities Nuclear Power Station Unit 2, December 1974.

* Approved revision number at time reload analyses are performed.

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2.2 LIMITING SAFETY SYSTEM SETTING BASES

In compliance with Section III of the ASME Code, the safety valves must be set to open at no higher than 103% of design pressure, and they must limit the reactor pressure to no more than 110% of design pressure. Both the high neutron flux scram and safety valve actuation are required to prevent overpressurizing the reactor pressure vessel and thus exceeding the pressure safety limit. The pressure scram is available as backup protection to the high flux scram. Analyses are performed as described in the "Generic Reload Fuel Application," NEDE-24011-P-A (approved revision number at time reload analyses are performed) for each reload to assure that the pressure safety limit is not exceeded. If the high-flux scram were to fail, a high-pressure scram would occur at 1060 psig.

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3.1/4.1 REACTOR PROTECTION SYSTEM

LIMITING CONDITIONS FOR OPERATION

Applicability:

Applies to the instrumentation and associated devices which initiate a reactor scram.

Objective:

To assure the operability of the reactor protection system.

SURVEILLANCE REQUIREMENTS

Applicability:

Applies to the surveillance of the instrumentation and associated devices which initiate reactor scram.

Objective:

To specify the type and frequency of surveillance to be applied to the protection instrumentation.

SPECIFICATIONS

A. The setpoints, minimum number of trip systems, and minimum number of instrument channels that must be operable for each position of the reactor mode switch shall be as given in Tables 3.1-1 through 3.1-4. The system response times from the opening of the sensor contact up to and including the opening of the trip actuator contacts shall not exceed 100 milliseconds.

B. If, during operation, the maximum fraction of limiting power density exceeds the fraction of rated power when operating above 25% rated thermal power, either:

1. the APRM scram and rod block settings shall be reduced to the values given by the equations in Specifications 2.1.A.1 and 2.1.B. This may also be accomplished by increasing the APRM gain as described therein.

2. the power distribution shall be changed such that the maximum fraction of limiting power density no longer exceeds the fraction of rated power.

A. Instrumentation systems shall be functionally tested and calibrated as indicated in Tables 4.1-1 and 4.1-2 respectively.

B. Daily during reactor power operation, the core power distribution shall be checked for maximum fraction of limiting power density (MFLPD) and compared with the fraction of rated power (FRP) when operating above 25% rated thermal power.

C. When it is determined that a channel is failed in the unsafe condition and Column 1 of Tables 3.1-1 through 3.1-3 cannot be met, that trip system must be put in the tripped condition immediately. All other RPS channels that monitor the same variable shall be functionally tested within 8 hours. The trip system with the failed channel may be untripped for a period of time not to exceed 1 hour to conduct this testing. As long as the trip system with the failed channel contains at least one operable channel monitoring that same variable, that trip system may be placed in the untripped position for short periods of time to allow functional testing of all RPS instrument channels as specified by Table 4.1-1. The trip system may be in the untripped position for no more than 8 hours per functional test period for this testing.

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b. the delayed neutron fraction chosen for the bounding reactivity curve

c. a beginning-of-life Doppler reactivity feedback

d. scram times slower than the Technical Specification rod scram insertion rate (Section 3.3.C.1)

e. the maximum possible rod drop velocity of 3.11 fps

f. the design accident and scram reactivity shape function, and

g. the moderator temperature at which criticality occurs

In most cases the worth of insequence rods or rod segments in conjunction with the actual values of the other important accident analysis parameters described above, would most likely result in a peak fuel enthalpy substantially less than 280 cal/g design limit.

Should a control drop accident result in a peak fuel energy content of 280 cal/g, fewer than 660 (7 x 7) fuel rods are conservatively estimated to perforate. This would result in an offsite dose well below the guideline value of 10 CFR 100. For 8 x 8 fuel, fewer than 850 rods are conservatively estimated to perforate, with nearly the same consequences as for the 7 x 7 fuel case because of the rod power differences.

The rod worth minimizer provides automatic supervision to assure that out of sequence control rods will not be withdrawn or inserted; i.e., it limits operator deviations from planned withdrawal sequences (reference SAR Section 7.9). It serves as a backup to procedural control of control rod worth. In the event that the rod worth minimizer is out of service when required, a licensed operator or other qualified technical employee can manually fulfill the control rod pattern conformance function of the rod worth minimizer. In this case, the normal procedural controls are backed up by independent procedural controls to assure conformance.

4. The source range monitor (SRM) system performs no automatic safety system function, i.e., it has no scram function. It does provide the operator with a visual indication of neutron level. This is needed for knowledgeable and efficient reactor startup at low neutron levels. The consequences of reactivity accidents are functions of the initial neutron flux. The requirement of at least 3 counts per second assures that any transient, should it occur, begins at or above the initial value of 10^{-8} of rated power used in the analyses of transients from cold conditions. One operable SRM channel would be adequate to monitor the approach to criticality using homogeneous patterns of scattered control rod withdrawal. A minimum of two operable SRM's is provided as an added conservatism.

5. The rod block monitor (RBM) is designed to automatically prevent fuel damage in the event of erroneous rod withdrawal from locations of high power density during high power operation. Two channels are provided, and one of these may be bypassed from the console for maintenance and/or testing. Tripping of one of the channels will block erroneous rod withdrawal soon enough to prevent fuel damage. This system backs up the operator, who withdraws control rods according to a written sequence. The specified restrictions with one channel out of service conservatively assure that fuel damage will not occur due to rod withdrawal errors when this condition exists. During reactor operation with certain limiting control rod patterns, the withdrawal of a designated single control rod could result in one of more fuel rods with MCPR's less than the MCPR fuel cladding integrity safety limit. During use of such patterns it is judged that testing of the RBM system to assure its operability prior to withdrawal of such rods will assure that improper withdrawal does not occur. It is the responsibility of the Nuclear Engineer to identify these limiting patterns and the designated rods either when the [illegible] established or as they develop due to the occurrence of inoperable control rods in other than [illegible] patterns.

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C. Scram Insertion Times

The control rod system is analyzed to bring the reactor subcritical at a rate fast enough to prevent fuel damage, i.e., to prevent the MCPR from becoming less than the fuel cladding integrity safety limit.

Analysis of the limiting power transient shows that the negative reactivity rates resulting from the scram with the average response of all the drives as given in the above specification, provide the required protection, and MCPR remains greater than the fuel cladding integrity safety limit. The minimum amount of reactivity to be inserted during a scram is controlled by permitting no more than 10% of the operable rods to have long scram times. In the analytical treatment of the transients, 390 milliseconds are allowed between a neutron sensor reaching the scram point and the start of motion of the control rods. This is adequate and conservative when compared to the typically observed time delay of about 270 milliseconds. Approximately 70 milliseconds after neutron flux reaches the trip point, the pilot scram valve solenoid deenergizes. Approximately 200 milliseconds later, control rod motion begins. The time to deenergize the pilot valve scram solenoids is measured during the calibration tests required by Specification 4.1. The 200 milliseconds are included in the allowable scram insertion times specified in Specification 3.3.C.

The scram times for all control rods will be determined at the time of each refueling outage. A representative sample of control rods will be scram tested following a shutdown.

Scram times of new drives are approximately 2.5 to 3 seconds; lower rates of change in scram times following initial plant operation at power are expected. The test schedule provides reasonable assurance of detection of slow drives before system deterioration beyond the limits of Specification 3.3.C. The program was developed on the basis of the statistical approach outlined below and judgment.

The history of drive performance accumulated to date indicates that the 90% insertion times of new and overhauled drives approximate a normal distribution about the mean which tends to become skewed toward longer scram times as operating time is accumulated. The probability of a drive not exceeding the mean 90% insertion time by 0.75 seconds is greater than 0.999 for a normal distribution. The measurement of the scram performance of the drives surrounding a drive exceeding the expected range of scram performance will detect local variations and also provide assurance that local scram time limits are not exceeded. Continued monitoring of other drives exceeding the expected range of scram times provides surveillance of possible anomalous performance.

The numerical values assigned to the predicted scram performance are based on the analysis of the Dresden 2 startup data and of data from other BWR's such as Nine Mile Point and Oyster Creek.

The occurrence of scram times within the limits, but significantly longer than average, should be viewed as an indication of a systematic problem with control rod drives especially if the number of drives exhibiting such scram times exceeds eight, the allowable number of inoperable rods.

cycle by a[illegible] that water can be run through the drain lines and actuating the air-operated valves by operation of the following sensors:

1) loss of air

2) equipment drain sump high level

3) vault high level

d. The condenser pit 5-foot trip circuits for each channel shall be checked once a month. A logic system functional test shall be performed during each refueling outage.

I. Average Planar LHGR

During steady-state power operation, the average linear heat generation rate (APLHGR) of all the rods in any fuel assembly, as a function of average planar exposure, at any axial location, shall not exceed the maximum average planar LHGR shown in Figure 3.5-1. If at any time during operation it is determined by normal surveillance that the limiting value for APLHGR is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the APLHGR is not returned in within the prescribed limits within 2 hours, the reactor shall be brought to the cold shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits.

I. Average Planar LHGR

Daily during steady state operation above 25% rated thermal power, the average planar LHGR shall be determined.

J. Local LHGR

During steady-state power operation, the linear heat generation rate (LHGR) of any rod in any fuel assembly at any axial location shall not exceed the maximum allowable LHGR. If at any time during operation it is determined by normal surveillance that the limiting value for LHGR is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the LHGR is not returned to

J. Local LHGR

Daily during steady-state power operation above 25% of rated thermal power, the local LHGR shall be determined.

1252 028

within the prescribed limits within 2 hours, the reactor shall be brought to the cold shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits.

Maximum allowable LHGR for all 8X8 fuel types is 13.4 KW/ft. For 7X7 and mixed oxide fuel, the maximum allowable LHGR is as follows:

$$LHGR_{max} < LHGR_d \; 1 - (\Delta P/P)_{max}(L/L_t)$$

where:

$LHGR_d$ = design LHGR

= 17.5 kW/ft.

$(\Delta P/P)_{max}$ = maximum power spiking penalty

= .035 initial core fuel

= .029 reload 1, 7 x 7 fuel

= .028 reload 1, 7 x 7 mixed oxide fuel

L_t = total core length

= 12 feet

L = Axial distance from bottom of core

K. Minimum Critical Power Ratio (MCPR)

During steady-state operation MCPR shall be greater than or equal to

1.35 (7 x 7 fuel)
1.35 (8 x 8 fuel)

at rated power and flow. If at any time during operation it is determined by normal surveillance that the limiting value for MCPR is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the steady-state MCPR is not returned to within the prescribed limits within 2 hours, the reactor shall be brought to the cold shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits. For core flows other than rated, these nominal values of MCPR shall be increased by a factor of k_f where k_f is as shown in Figure 3.5.2.

K. Minimum Critical Power Ratio (MCPR)

The MCPR shall be determined daily during steady-state power operation above 25% of rated thermal power.

1252 029