



FirstEnergy Nuclear Operating Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077

Rod L. Penfield
Site Vice President

724-682-5234
Fax: 724-643-8069

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L-19-239

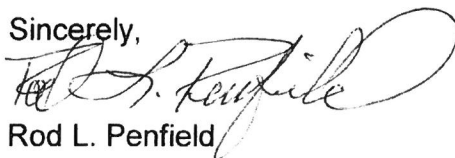
ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:
Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Cycle 27 Core Operating Limits Report

Pursuant to the requirements of Beaver Valley Power Station, Unit No. 1 Technical Specification 5.6.3, "CORE OPERATING LIMITS REPORT (COLR)," FirstEnergy Nuclear Operating Company hereby submits the COLR for Cycle 27. Technical Specification 5.6.3.d requires, in part, that the COLR be provided to the Nuclear Regulatory Commission upon issuance for each reload cycle, including any midcycle revisions or supplements. The Cycle 27 COLR was made effective on October 22, 2019.

There are no regulatory commitments contained in this submittal. If there are any questions, or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager - FENOC Nuclear Licensing and Regulatory Affairs, at (330) 315-6808.

Sincerely,



Rod L. Penfield

Enclosure:

Beaver Valley Power Station, Unit No. 1, Core Operating Limits Report, Cycle 27

cc: NRC Region I Administrator
NRC Resident Inspector
NRC Project Manager
Director BRP/DEP
Site BRP/DEP Representative

Enclosure
L-19-239

Beaver Valley Power Station, Unit No. 1,
Core Operating Limits Report, Cycle 27
(16 Pages Follow)

5.0 ADMINISTRATIVE CONTROLS

5.1 Core Operating Limits Report

This Core Operating Limits Report provides the cycle specific parameter limits developed in accordance with the NRC approved methodologies specified in Technical Specification Administrative Control 5.6.3.

5.1.1 SL 2.1.1 Reactor Core Safety Limits

See Figure 5.1-1.

5.1.2 SHUTDOWN MARGIN (SDM)

- a. In MODES 1, 2, 3, and 4, SHUTDOWN MARGIN shall be $\geq 1.77\% \Delta k/k$.⁽¹⁾
- b. Prior to manually blocking the Low Pressurizer Pressure Safety Injection Signal, the Reactor Coolant System shall be boric to \geq the MODE 5 boron concentration and shall remain \geq this boron concentration at all times when this signal is blocked.
- c. In MODE 5, SHUTDOWN MARGIN shall be $\geq 1.0\% \Delta k/k$.

5.1.3 LCO 3.1.3 Moderator Temperature Coefficient (MTC)

- a. Upper Limit - MTC shall be maintained within the acceptable operation limit specified in Technical Specification Figure 3.1.3-1.
- b. Lower Limit - MTC shall be maintained less negative than $-4.4 \times 10^{-4} \Delta k/k/^{\circ}F$ at RATED THERMAL POWER.
- c. 300 ppm Surveillance Limit: $(-37 \text{ pcm}/^{\circ}F)$
- d. The revised predicted near-EOL 300 ppm MTC shall be calculated using Figure 5.1-5 and the following algorithm from Reference 11 :

Revised Predicted MTC = Predicted MTC* + AFD Correction** + Predictive Correction***

where,

* Predicted MTC is calculated from Figure 5.1-5 at the burnup corresponding to the measurement of 300 ppm at RTP conditions,

** AFD Correction is the more negative value of :

$\{0 \text{ pcm}/^{\circ}F \text{ or } (\Delta AFD * AFD \text{ Sensitivity})\}$

where: ΔAFD is the measured AFD minus the predicted AFD from an incore flux map taken at or near the burnup corresponding to 300 ppm.

and

$AFD \text{ Sensitivity} = 0.10 \text{ pcm}/^{\circ}F / \Delta AFD$

***Predictive Correction is $-3 \text{ pcm}/^{\circ}F$.

(1) The MODE 1 and MODE 2 with $k_{eff} \geq 1.0$ SDM requirements are included to address SDM requirements (e.g., MODE 1 Required Actions to verify SDM) that are not within the applicability of LCO 3.1.1, SHUTDOWN MARGIN (SDM).

5.1 Core Operating Limits Report

If the revised predicted MTC is less negative than the SR 3.1.3.2 limit (COLR 5.1.3.c) and all of the benchmark data contained in the surveillance procedure are met, then an MTC measurement, in accordance with SR 3.1.3.2, is not required.

- e. 60 ppm Surveillance Limit: (- 42.5 pcm/°F)

5.1.4 LCO 3.1.5 Shutdown Bank Insertion Limits

The Shutdown Banks shall be withdrawn to at least 225 steps.⁽²⁾

5.1.5 LCO 3.1.6 Control Bank Insertion Limits

- Control Banks A and B shall be withdrawn to at least 225 steps.⁽²⁾
- Control Banks C and D shall be limited in physical insertion as shown in Figure 5.1-2.⁽²⁾
- Sequence Limits - The sequence of withdrawal shall be A, B, C and D bank, in that order.
- Overlap Limits⁽²⁾ - Overlap shall be such that step 129 on banks A, B, and C corresponds to step 1 on the following bank. When C bank is fully withdrawn, these limits are verified by confirming D bank is withdrawn at least to a position equal to the all-rods-out position minus 128 steps.

5.1.6 LCO 3.2.1 Heat Flux Hot Channel Factor ($F_Q(Z)$)

The Heat Flux Hot Channel Factor - $F_Q(Z)$ limit is defined by:

$$F_Q(Z) \leq \left[\frac{CFQ}{P} \right] * K(Z) \quad \text{for } P > 0.5$$

$$F_Q(Z) \leq \left[\frac{CFQ}{0.5} \right] * K(Z) \quad \text{for } P \leq 0.5$$

Where: $CFQ = 2.40$ $P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$

$K(Z)$ = the function obtained from Figure 5.1-3.

$$F_Q^C(Z) = F_Q^M(Z) * 1.0815^{\$}$$

$$F_Q^W(Z) = F_Q^C(Z) * W(Z)$$

(2) As indicated by the group demand counter

\$ An additional uncertainty is to be applied if the number of measured thimbles for the moveable incore detector system is less than 75% of the total number of thimbles. If there are less than 75% of the total number of thimbles and at least 50% of the total number of thimbles measured, an additional uncertainty of $(0.01) * (3 - T/12.5)$ is added to the measurement uncertainty, 1.05, where T is the total number of measured thimbles. This adjusted measurement uncertainty is then multiplied by 1.03 to obtain the total uncertainty to be applied. At least three measured thimbles per core quadrant are also required.

5.1 Core Operating Limits Report

The W(Z) values are provided in Table 5.1-1 and 5.1-2. The W(Z) values in Table 5.1-1 were generated assuming that they will be used for full power surveillance. The W(Z) values in Table 5.1-2 were generated assuming that they will be used for a part power surveillance during initial cycle startup following the refueling outage. When a part power surveillance is performed, the W(Z) values should be multiplied by the factor 1/P, when $P > 0.5$. When $P \leq 0.5$, the W(Z) values should be multiplied by the factor 1/(0.5), or 2.0. This is consistent with the adjustment in the $F_Q(Z)$ limit at part power conditions.

The $F_Q(Z)$ penalty function, applied when the analytic $F_Q(Z)$ function increases from one monthly measurement to the next, is provided in Table 5.1-3.

5.1.7 LCO 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$)

$$F_{\Delta H}^N \leq CF_{\Delta H} * (1 + PF_{\Delta H} (1-P))^{\$}$$

Where: $CF_{\Delta H}$ = Value listed in Table 5.1-4

$$PF_{\Delta H} = 0.3$$

$$P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$$

5.1.8 LCO 3.2.3 Axial Flux Difference (AFD)

The AFD acceptable operation limits are provided in Figure 5.1-4.

5.1.9 LCO 3.3.1 Reactor Trip System Instrumentation - Overtemperature and Overpower ΔT Parameter Values from Table Notations 1 and 2a. Overtemperature ΔT Setpoint Parameter Values:

<u>Parameter</u>	<u>Value</u>
Overtemperature ΔT reactor trip setpoint	$K1 \leq 1.242$
Overtemperature ΔT reactor trip setpoint Tavg coefficient	$K2 \geq 0.0183/^{\circ}\text{F}$
Overtemperature ΔT reactor trip setpoint pressure coefficient	$K3 \geq 0.001/\text{psia}$
Tavg at RATED THERMAL POWER	$T' \leq 577.9^{\circ}\text{F}^{(1)}$

$\$$ An additional uncertainty is to be applied if the number of measured thimbles for the moveable incore detector system is less than 75% of the total number of thimbles. If there are less than 75% of the total number of thimbles and at least 50% of the total number of thimbles measured, an additional uncertainty of $(0.01) * (3 - T/12.5)$ is added to the standard uncertainty on $F_{N\Delta H}$ of 1.04, where T is the total number of measured thimbles. At least three measured thimbles per core quadrant are also required.

(1) T' represents the cycle-specific Full Power Tavg value used in core design.

5.1 Core Operating Limits Report

Nominal pressurizer pressure	$P' \geq 2250$ psia
Measured reactor vessel average temperature lead/lag time constants	$\tau_1 \geq 30$ secs $\tau_2 \leq 4$ secs
Measured reactor vessel ΔT lag time constant	$\tau_4 \leq 6$ secs
Measured reactor vessel average temperature lag time constant	$\tau_5 \leq 2$ secs

$f(\Delta I)$ is a function of the indicated difference between top and bottom detectors of the power-range nuclear ion chambers; with gains to be selected based on measured instrument response during plant startup tests such that:

- (i) For $q_t - q_b$ between -37% and +15%, $f(\Delta I) = 0$ (where q_t and q_b are percent RATED THERMAL POWER in the top and bottom halves of the core respectively, and $q_t + q_b$ is total THERMAL POWER in percent of RATED THERMAL POWER).
- (ii) For each percent that the magnitude of $(q_t - q_b)$ exceeds -37%, the ΔT trip setpoint shall be automatically reduced by 2.52% of its value at RATED THERMAL POWER.
- (iii) For each percent that the magnitude of $(q_t - q_b)$ exceeds +15%, the ΔT trip setpoint shall be automatically reduced by 1.47% of its value at RATED THERMAL POWER.

b. Overpower ΔT Setpoint Parameter Values:

<u>Parameter</u>	<u>Value</u>
Overpower ΔT reactor trip setpoint	$K4 \leq 1.085$
Overpower ΔT reactor trip setpoint Tav _g rate/lag coefficient	$K5 \geq 0.02/^{\circ}\text{F}$ for increasing average temperature $K5 = 0/^{\circ}\text{F}$ for decreasing average temperature
Overpower ΔT reactor trip setpoint Tav _g heatup coefficient	$K6 \geq 0.0021/^{\circ}\text{F}$ for $T > T''$ $K6 = 0/^{\circ}\text{F}$ for $T \leq T''$
Tav _g at RATED THERMAL POWER	$T'' \leq 577.9^{\circ}\text{F}^{(2)}$
Measured reactor vessel average temperature rate/lag time constant	$\tau_3 \geq 10$ secs
Measured reactor vessel ΔT lag time constant	$\tau_4 \leq 6$ secs
Measured reactor vessel average temperature lag time constant	$\tau_5 \leq 2$ secs

- (2) T'' represents the cycle-specific Full Power Tav_g value used in core design.

5.1 Core Operating Limits Report

5.1.10 LCO 3.4.1, RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits

<u>Parameter</u>	<u>Indicated Value</u>
Reactor Coolant System T _{avg}	T _{avg} ≤ 581.5°F ⁽¹⁾
Pressurizer Pressure	Pressure ≥ 2218 psia ⁽²⁾
Reactor Coolant System Total Flow Rate	Flow ≥ Value listed in Table 5.1-4 ⁽³⁾

5.1.11 LCO 3.9.1 Boron Concentration (MODE 6)

The boron concentration of the Reactor Coolant System, the refueling canal, and the refueling cavity shall be maintained ≥ 2400 ppm. This value includes a 50 ppm conservative allowance for uncertainties.

-
- (1) The Reactor Coolant System (RCS) indicated T_{avg} value is determined by adding the appropriate allowances for rod control operation and verification via control board indication (3.6°F) to the cycle specific full power T_{avg} used in the core design.
- (2) The pressurizer pressure value includes allowances for pressurizer pressure control operation and verification via control board indication.
- (3) The RCS total flow rate includes allowances for normalization of the cold leg elbow taps with a beginning of cycle precision RCS flow calorimetric measurement and verification on a periodic basis via control board indication.

5.1 Core Operating Limits Report

5.1.12 References

1. WCAP-9272-P-A, "WESTINGHOUSE RELOAD SAFETY EVALUATION METHODOLOGY," July 1985 (Westinghouse Proprietary).
2. WCAP-8745-P-A, "Design Bases for the Thermal Overpower ΔT and Thermal Overtemperature ΔT Trip Functions," September 1986.
3. WCAP-12945-P-A, Volume 1 (Revision 2) and Volumes 2 through 5 (Revision 1), "Code Qualification Document for Best Estimate LOCA Analysis," March 1998 (Westinghouse Proprietary).
4. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control- F_Q Surveillance Technical Specification," February 1994.
5. WCAP-14565-P-A, "VIPRE-01 Modeling and Qualification for Pressurized Water Reactor Non-LOCA Thermal-Hydraulic Safety Analysis," October 1999.
6. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," April 1995 (Westinghouse Proprietary).
7. WCAP-15025-P-A, "Modified WRB-2 Correlation, WRB-2M, for Predicting Critical Heat Flux in 17x17 Rod Bundles with Modified LPD Mixing Vane Grids," April 1999.
8. Caldon, Inc. Engineering Report-80P, "Improving Thermal Power Accuracy and Plant Safety While Increasing Operating Power Level Using the LEFM \sqrt{TM} System," Revision 0, March 1997.
9. Caldon, Inc. Engineering Report-160P, "Supplement to Topical Report ER-80P: Basis for a Power Uprate With the LEFM \sqrt{TM} System," Revision 0, May 2000.
10. WCAP-16009-P-A, "Realistic Large Break LOCA Evaluation Methodology Using Automated Statistical Treatment of Uncertainty Method (ASTRUM)," Revision 0, January 2005.
11. WCAP-13749-P-A, "Safety Evaluation Supporting the Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement," March 1997 (Westinghouse Proprietary).
12. WCAP-16045-P-A, "Qualification of the Two-Dimensional Transport Code PARAGON," August 2004.
13. WCAP-16045-P-A, Addendum 1-A, "Qualification of the NEXUS Nuclear Data Methodology," August 2007.
14. WCAP-12610-P-A & CENPD-404-P-A, Addendum 1-A, "Optimized ZIRLO TM ," July 2006.

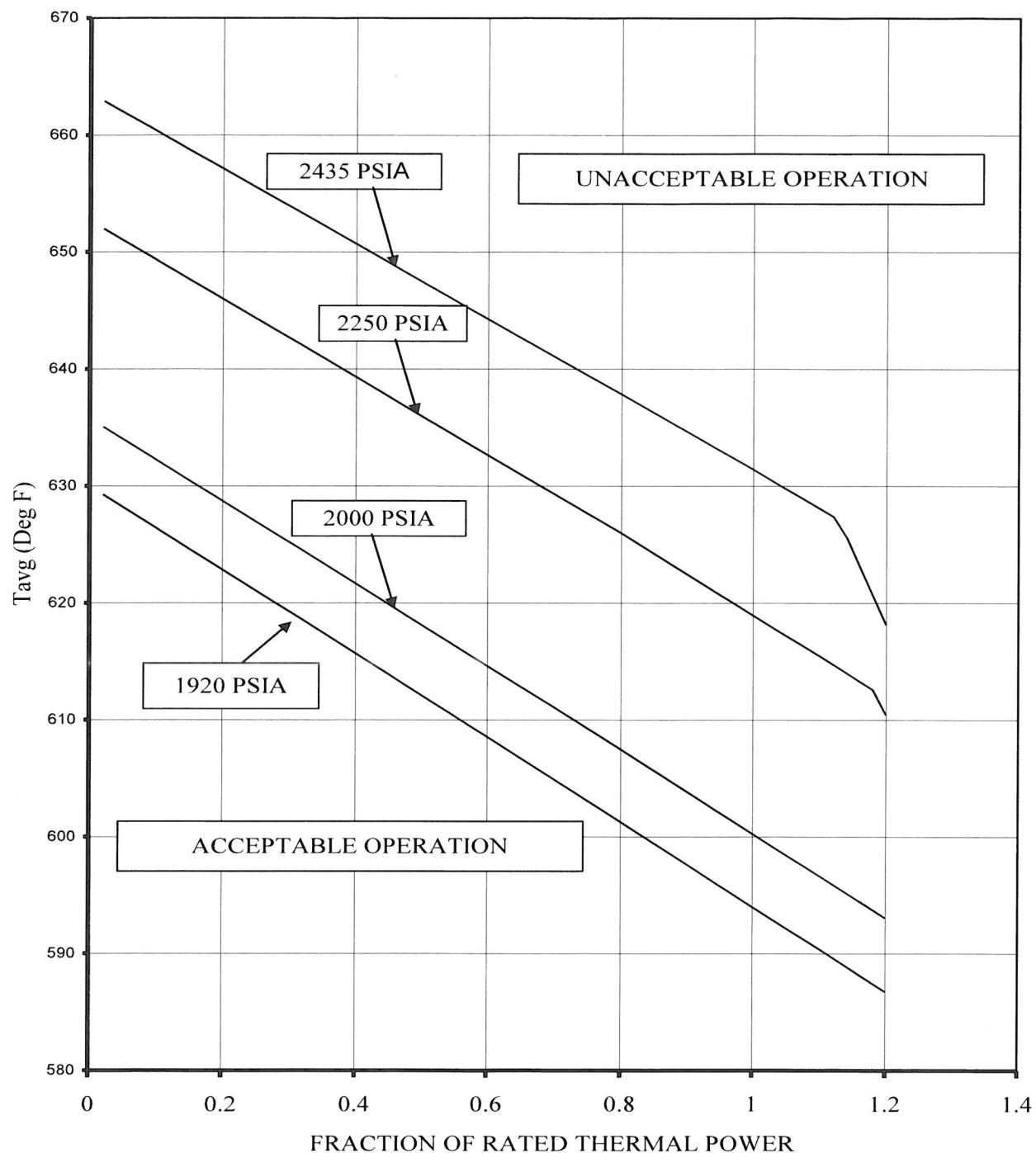


Figure 5.1-1 (Page 1 of 1)

REACTOR CORE SAFETY LIMIT
THREE LOOP OPERATION
(Technical Specification Safety Limit 2.1.1)

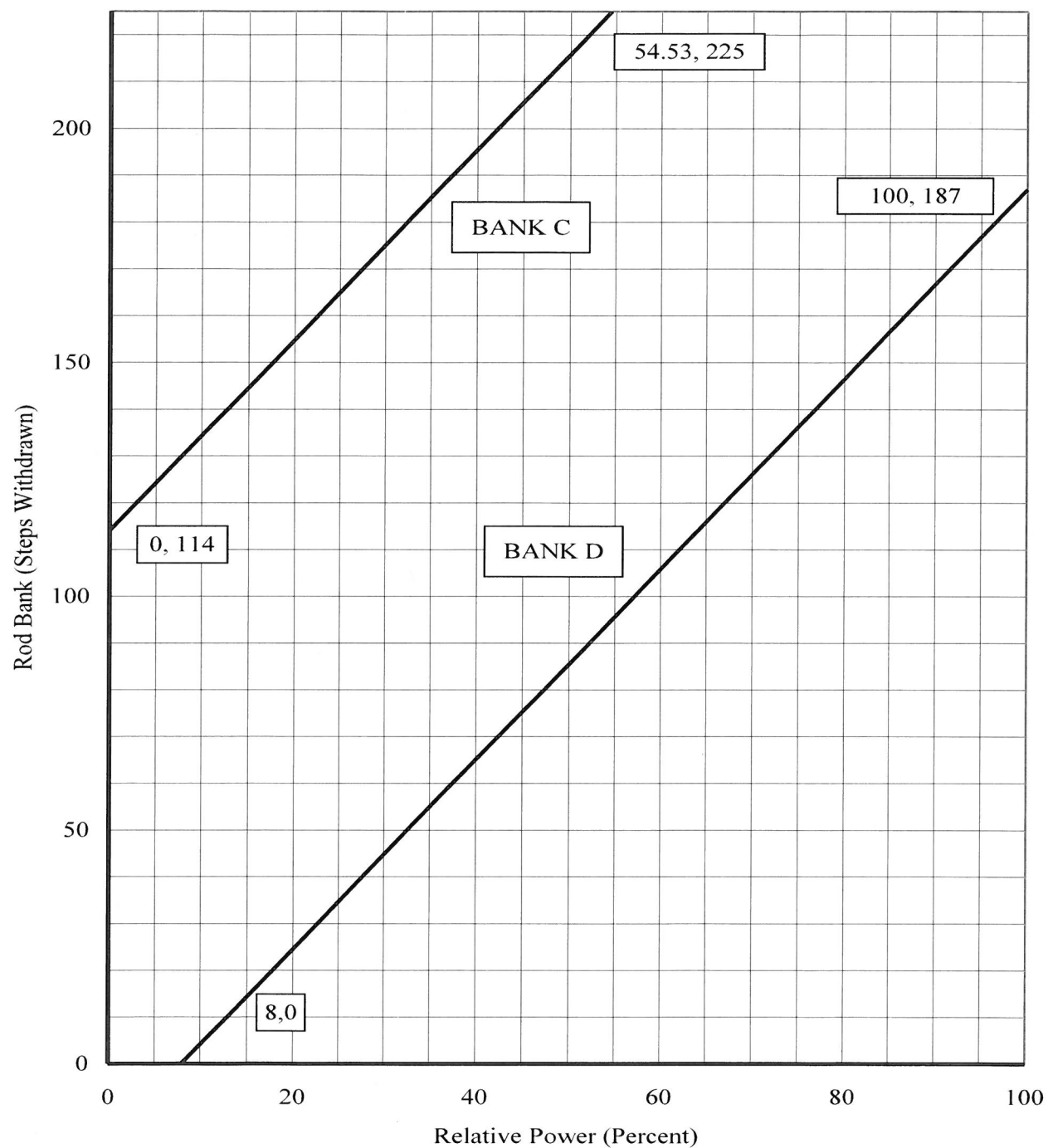


Figure 5.1-2 (Page 1 of 1)

CONTROL ROD INSERTION LIMITS

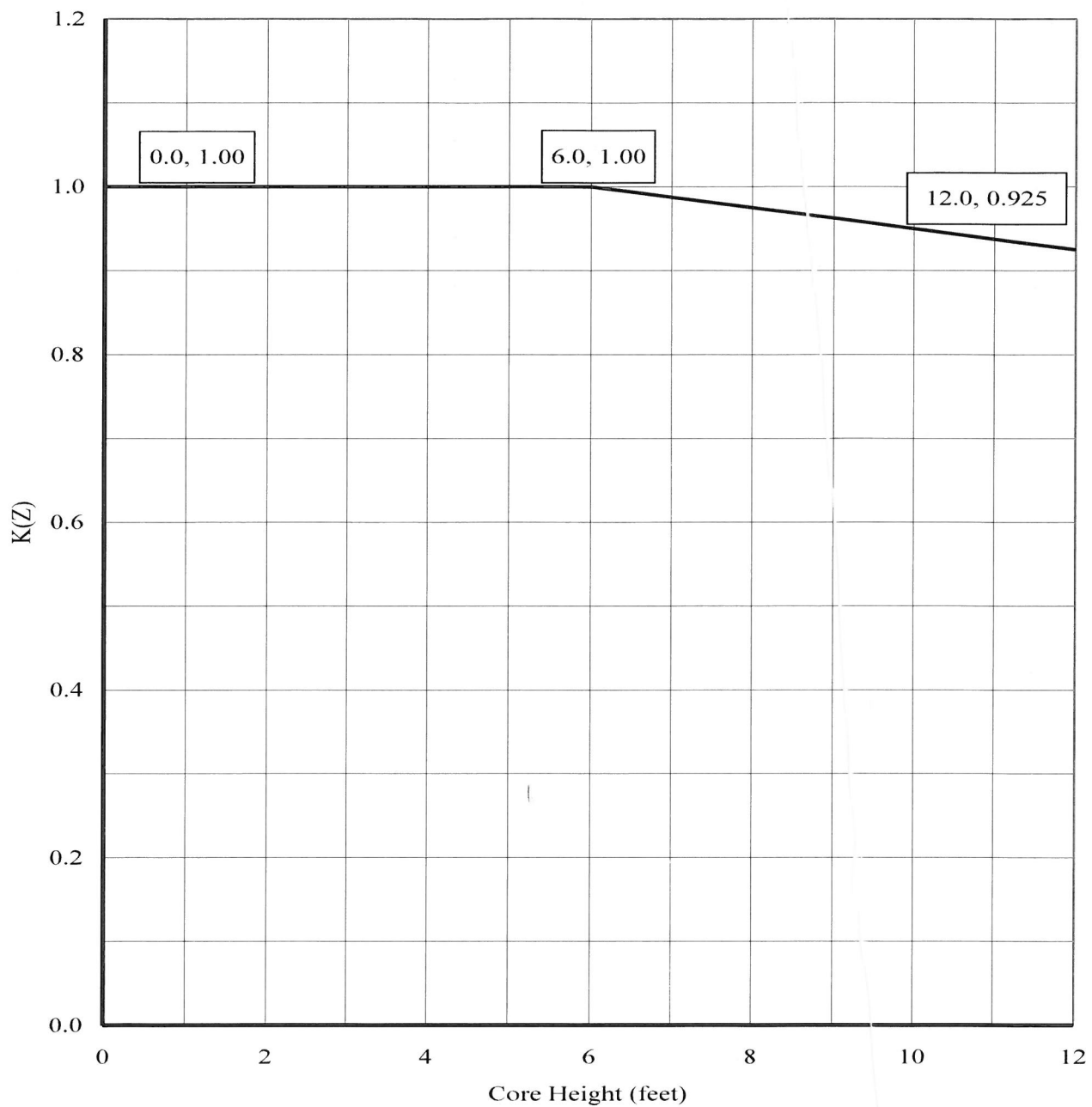


Figure 5.1-3 (Page 1 of 1)

F_QT NORMALIZED OPERATING ENVELOPE, $K(Z)$

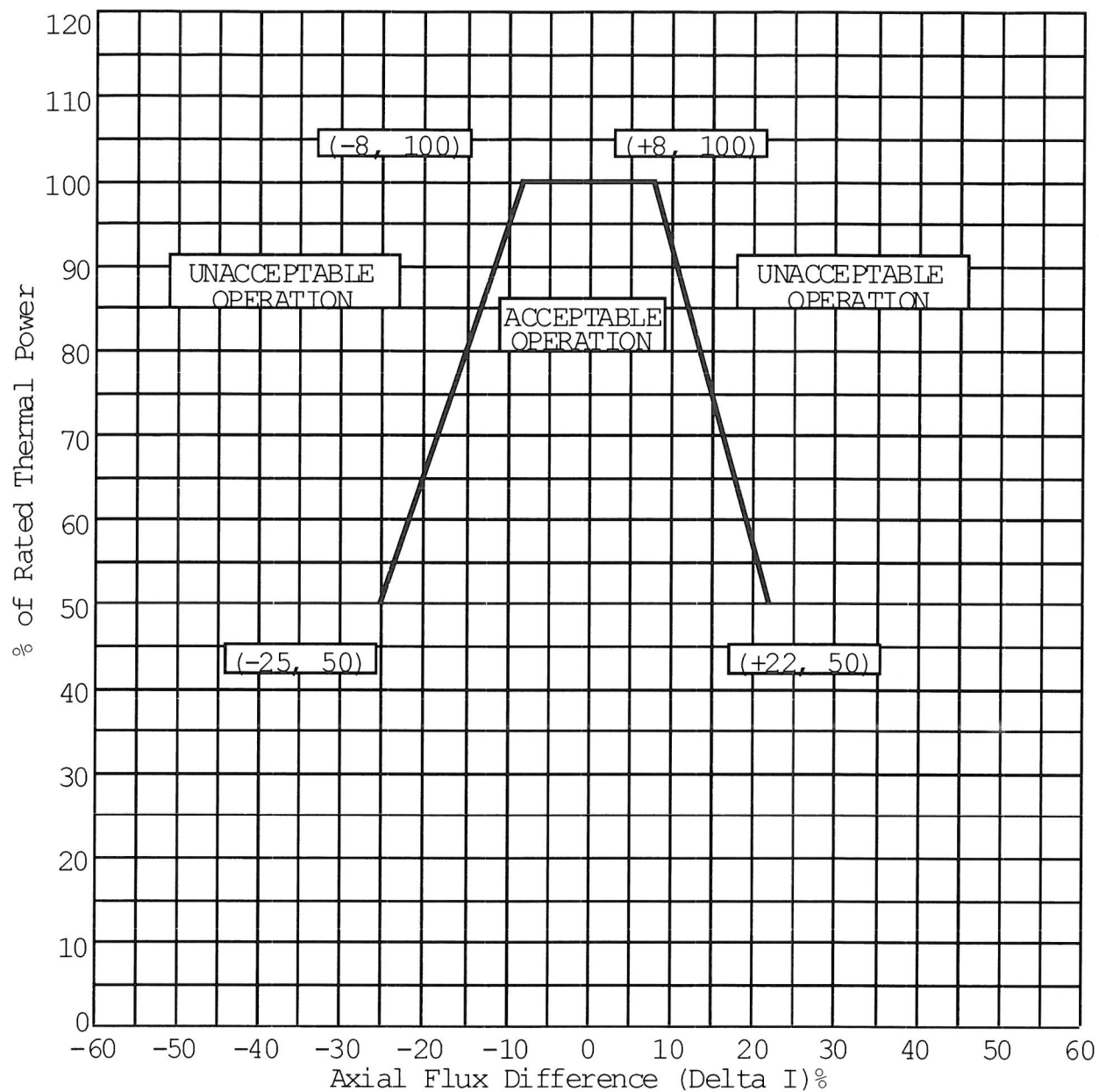


Figure 5.1-4 (Page 1 of 1)

AXIAL FLUX DIFFERENCE LIMITS AS A FUNCTION OF
PERCENT OF RATED THERMAL POWER FOR RAOC

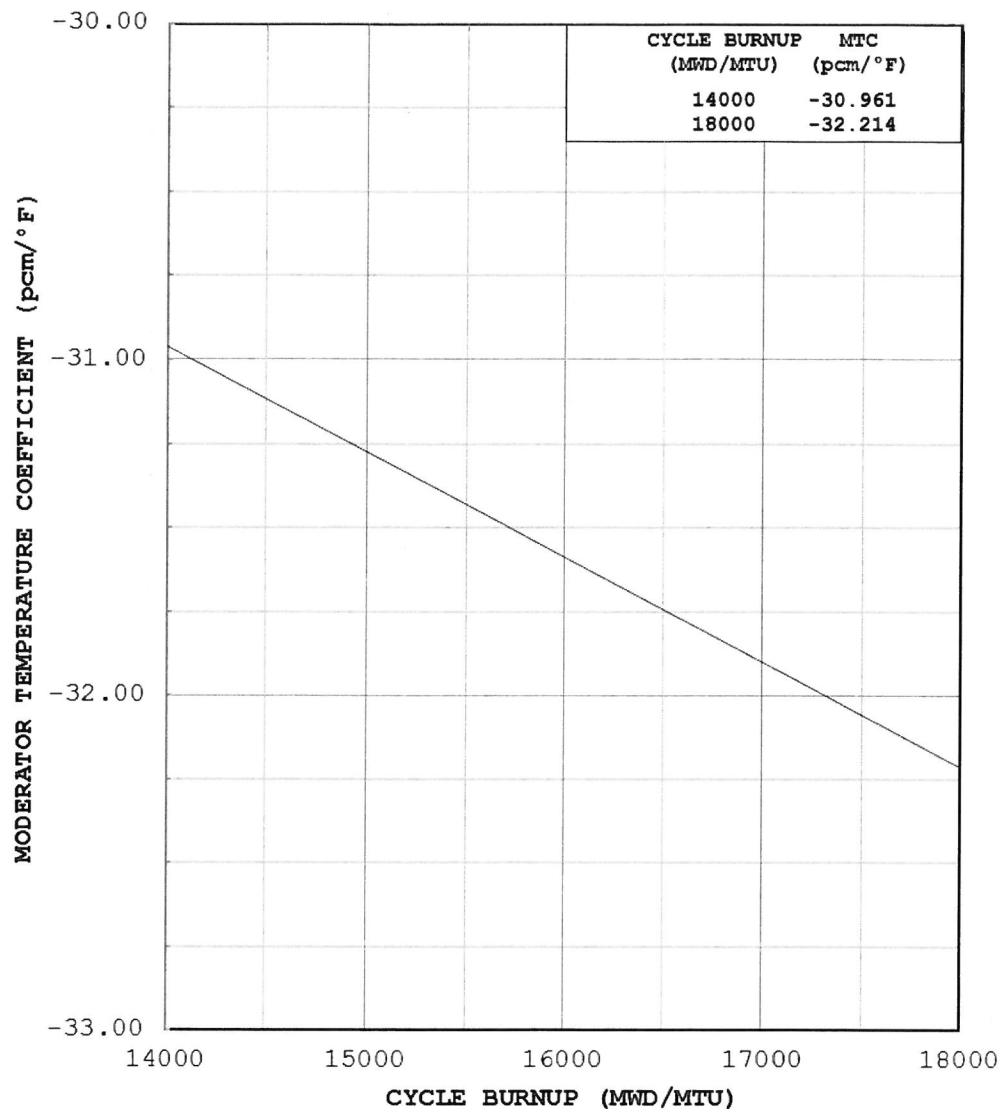


Figure 5.1-5 (Page 1 of 1)

HOT FULL POWER PREDICTED

MODERATOR TEMPERATURE COEFFICIENT

AS A FUNCTION OF CYCLE BURNUP

WHEN 300 PPM IS ACHIEVED

Table 5.1-1 (Page 1 of 2)
F_Q Surveillance W(Z) Function versus Burnup at 100% RTP

Exclusion Zone	Axial Point	Elevation (feet)	150 MWD/MTU	3000 MWD/MTU	8000 MWD/MTU	12000 MWD/MTU	16000 MWD/MTU
*	1	12.08	1.0000	1.0000	1.0000	1.0000	1.0000
*	2	11.88	1.0000	1.0000	1.0000	1.0000	1.0000
*	3	11.68	1.0000	1.0000	1.0000	1.0000	1.0000
*	4	11.47	1.0000	1.0000	1.0000	1.0000	1.0000
*	5	11.27	1.0000	1.0000	1.0000	1.0000	1.0000
*	6	11.07	1.0000	1.0000	1.0000	1.0000	1.0000
*	7	10.87	1.0000	1.0000	1.0000	1.0000	1.0000
	8	10.67	1.1550	1.1976	1.2469	1.2126	1.1954
	9	10.47	1.1500	1.1963	1.2385	1.2102	1.1908
	10	10.27	1.1533	1.1930	1.2287	1.2060	1.1859
	11	10.07	1.1437	1.1883	1.2200	1.2003	1.1807
	12	9.86	1.1451	1.1842	1.2195	1.1982	1.1752
	13	9.66	1.1500	1.1809	1.2185	1.1980	1.1694
	14	9.46	1.1470	1.1715	1.2115	1.1957	1.1662
	15	9.26	1.1412	1.1681	1.2106	1.1921	1.1721
	16	9.06	1.1401	1.1635	1.2080	1.1884	1.1790
	17	8.86	1.1415	1.1560	1.2030	1.1868	1.1832
	18	8.66	1.1505	1.1558	1.2035	1.1877	1.1867
	19	8.46	1.1574	1.1620	1.2062	1.1937	1.1894
	20	8.25	1.1628	1.1655	1.2068	1.1986	1.1925
	21	8.05	1.1668	1.1676	1.2053	1.2012	1.1947
	22	7.85	1.1695	1.1685	1.2027	1.2023	1.1995
	23	7.65	1.1698	1.1672	1.1979	1.2014	1.2031
	24	7.45	1.1690	1.1648	1.1920	1.1992	1.2054
	25	7.25	1.1664	1.1605	1.1837	1.1943	1.2045
	26	7.05	1.1632	1.1556	1.1742	1.1877	1.2016
	27	6.84	1.1590	1.1498	1.1644	1.1807	1.1976
	28	6.64	1.1531	1.1424	1.1532	1.1724	1.1926
	29	6.44	1.1466	1.1343	1.1443	1.1629	1.1861
	30	6.24	1.1396	1.1256	1.1370	1.1522	1.1780
	31	6.04	1.1315	1.1161	1.1286	1.1406	1.1688
	32	5.84	1.1225	1.1053	1.1194	1.1294	1.1587

Note: Top and Bottom 10% Excluded

Table 5.1-1 (Page 2 of 2)
F_Q Surveillance W(Z) Function versus Burnup at 100% RTP

Exclusion Zone	Axial Point	Elevation (feet)	150 MWD/MTU	3000 MWD/MTU	8000 MWD/MTU	12000 MWD/MTU	16000 MWD/MTU
	33	5.64	1.1131	1.1002	1.1098	1.1217	1.1474
	34	5.44	1.1109	1.0988	1.1021	1.1135	1.1364
	35	5.23	1.1118	1.0996	1.0984	1.1098	1.1327
	36	5.03	1.1114	1.1011	1.0974	1.1057	1.1292
	37	4.83	1.1120	1.1023	1.0956	1.1029	1.1254
	38	4.63	1.1157	1.1032	1.0938	1.0999	1.1208
	39	4.43	1.1195	1.1039	1.0916	1.0965	1.1155
	40	4.23	1.1227	1.1042	1.0894	1.0930	1.1101
	41	4.03	1.1256	1.1042	1.0870	1.0895	1.1043
	42	3.83	1.1295	1.1041	1.0842	1.0846	1.1008
	43	3.62	1.1339	1.1037	1.0811	1.0838	1.0984
	44	3.42	1.1376	1.1055	1.0781	1.0856	1.0958
	45	3.22	1.1408	1.1104	1.0753	1.0873	1.0923
	46	3.02	1.1442	1.1220	1.0749	1.0885	1.0945
	47	2.82	1.1506	1.1417	1.0792	1.0938	1.1037
	48	2.62	1.1665	1.1643	1.0918	1.1058	1.1172
	49	2.42	1.1875	1.1873	1.1081	1.1201	1.1326
	50	2.21	1.2079	1.2107	1.1251	1.1345	1.1481
	51	2.01	1.2285	1.2342	1.1418	1.1482	1.1624
	52	1.81	1.2488	1.2574	1.1581	1.1614	1.1759
	53	1.61	1.2676	1.2790	1.1734	1.1739	1.1889
	54	1.41	1.2844	1.2986	1.1874	1.1854	1.2009
*	55	1.21	1.0000	1.0000	1.0000	1.0000	1.0000
*	56	1.01	1.0000	1.0000	1.0000	1.0000	1.0000
*	57	0.81	1.0000	1.0000	1.0000	1.0000	1.0000
*	58	0.60	1.0000	1.0000	1.0000	1.0000	1.0000
*	59	0.40	1.0000	1.0000	1.0000	1.0000	1.0000
*	60	0.20	1.0000	1.0000	1.0000	1.0000	1.0000
*	61	0.00	1.0000	1.0000	1.0000	1.0000	1.0000

Note: Top and Bottom 10% Excluded

Table 5.1-2 (Page 1 of 2)
F_Q Surveillance W(Z) Function versus Burnup at 75% RTP

Exclusion Zone	Axial Point	Elevation (feet)	75% RTP
*	1	12.08	1.0000
*	2	11.88	1.0000
*	3	11.68	1.0000
*	4	11.47	1.0000
*	5	11.27	1.0000
*	6	11.07	1.0000
*	7	10.87	1.0000
	8	10.67	1.2616
	9	10.47	1.2465
	10	10.27	1.2173
	11	10.07	1.1881
	12	9.86	1.1706
	13	9.66	1.1635
	14	9.46	1.1473
	15	9.26	1.1237
	16	9.06	1.1064
	17	8.86	1.1019
	18	8.66	1.1013
	19	8.46	1.1016
	20	8.25	1.1024
	21	8.05	1.1014
	22	7.85	1.1006
	23	7.65	1.0982
	24	7.45	1.0949
	25	7.25	1.0925
	26	7.05	1.0892
	27	6.84	1.0860
	28	6.64	1.0799
	29	6.44	1.0758
	30	6.24	1.0699
	31	6.04	1.0640
	32	5.84	1.0567

Note: Top and Bottom 10% Excluded

Table 5.1-2 (Page 2 of 2)
F_Q Surveillance W(Z) Function versus Burnup at 75% RTP

Exclusion Zone	Axial Point	Elevation (feet)	75% RTP
	33	5.64	1.0508
	34	5.44	1.0510
	35	5.23	1.0555
	36	5.03	1.0569
	37	4.83	1.0609
	38	4.63	1.0673
	39	4.43	1.0744
	40	4.23	1.0798
	41	4.03	1.0853
	42	3.83	1.0943
	43	3.62	1.1018
	44	3.42	1.1093
	45	3.22	1.1163
	46	3.02	1.1236
	47	2.82	1.1338
	48	2.62	1.1529
	49	2.42	1.1772
	50	2.21	1.2008
	51	2.01	1.2269
	52	1.81	1.2504
	53	1.61	1.2743
	54	1.41	1.2940
*	55	1.21	1.0000
*	56	1.01	1.0000
*	57	0.81	1.0000
*	58	0.60	1.0000
*	59	0.40	1.0000
*	60	0.20	1.0000
*	61	0.00	1.0000

Note: Top and Bottom 10% Excluded

Table 5.1-3
 $F_Q(Z)$ Penalty Factor versus Burnup

Cycle Burnup (MWD/MTU)	$F_Q(Z)$ Penalty Factor
> 0	1.0200

Note: The Penalty Factor, to be applied to $F_Q(Z)$ in accordance with Technical Specification Surveillance Requirement (SR) 3.2.1.2, is the maximum factor by which $F_Q(Z)$ is expected to increase over a 39 Effective Full Power Day (EFPD) interval (surveillance interval of 31 EFPD plus the maximum allowable extension not to exceed 25% of the surveillance interval per Technical Specification SR 3.0.2) starting from the burnup at which the $F_Q(Z)$ was determined.

Table 5.1-4
 $F_{\Delta H}$ Limit versus Minimum Measured Flow

Minimum Measured Flow (MMF) (gpm)	$F_{\Delta H}$ Limit
$\geq 283,583$	1.62
$283,583 > \text{MMF} \geq 278,941$	1.60