

Attachment 1

Quad Cities Station Unit 2

Proposed Changes to Appendix A, Technical Specifications
to Facility Operating License DPR-30

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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 boundaries which separate radioactive materials from the environs. The integrity of the fuel cladding 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 shall result from an abnormal operational transient. Basis of the values derived for this safety limit for each fuel type is documented in Reference 1 and 2.

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 setpoints 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 LMGR of 17.5 kw/ft for 7 x 7 fuel and 13.4 kw/ft for all 8x8 fuel types. This constraint is established by Specification 3.5.3. 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.

Specification 3.5.J established the LHGR maximum which cannot be exceeded under steady power operation.

B. Core Thermal Power Limit (Reactor Pressure < 800 psia)

At pressures below 500 psia, the core elevation pressure drop (0 power, 0 flow) is greater than 4.56 psi. At low powers and flows this pressure differential is maintained in the bypass region of the core. Since the pressure drop in the bypass region is essentially all elevation head, the core pressure drop at low powers and flows will always be greater than 4.56 psi. Analyses show that with a flow of 28×10^3 lb/hr bundle flow, bundle pressure drop is nearly independent of bundle power and has a value of 3.5 psi. Thus the bundle flow with a 4.56-psi driving head will be greater than 28×10^3 lb/hr. Full scale ATLAS test data taken at pressures from 14.7 psia to 800 psia indicate that the fuel assembly critical power at this flow is approximately 3.35 MWt. At 25% of rated thermal power, the peak powered bundle would have to be operating at 3.86 times the average powered bundle in order to achieve this bundle power. Thus, a core thermal power limit of 25% for reactor pressures below 800 psia is conservative.

C. Power Transient

During transient operation the heat flux (thermal power-to-water) would lag behind the neutron flux due to the inherent heat transfer time constant of the fuel, which is 8 to 9 seconds. Also, the limiting safety system scram settings are at values which will not allow the reactor to be operated above the safety limit during normal operation or during other plant operating situations which have been analyzed in detail. In addition, control rod scrams are such that for normal operating transients, the neutron flux transient is terminated before a significant increase in surface heat flux occurs. **Control rod scram times are checked as required by Specification 4.3.C.** and the MCPR operating limit is modified as necessary per Specification 3.5.K.

Exceeding a neutron flux scram setting and a failure of the control rods to reduce flux to less than the scram setting within 1.5 seconds does not necessarily imply that fuel is damaged; however, for this specification, a safety limit violation will be assumed any time a neutron flux scram setting is exceeded for longer than 1.5 seconds.

If the scram occurs such that the neutron flux dwell time above the limiting safety system setting is less than 1.7 seconds, the safety limit will not be exceeded for normal turbine or generator trips, which are the most severe normal operating transients expected. These analyses show that even if the bypass system fails to operate, the design limit of MCPR = **the fuel cladding integrity safety limit is not exceeded.** Thus, use of a 1.5 second limit provides additional margin.

The computer provided has a sequence annunciation program which will indicate the sequence in which scrams occur, such as neutron flux, pressure, etc. This program also indicates when the scram setpoint is cleared. This will provide information on how long a scram condition exists and thus provide some measure of the energy added during a transient. Thus, computer information normally will be available for analyzing scrams; however, if the computer information should not be available for any scram analysis, Specification 1.1 C.2 will be relied on to determine if a safety limit has been violated.

During periods when the reactor is shut down, consideration must also be given to water level requirements due to the effect of decay heat. If reactor water level should drop below the top of the active fuel during this time, the ability to cool the core is reduced. This reduction in core-cooling capability could lead to elevated cladding temperatures and cladding perforation. The core will be cooled sufficiently to prevent cladding melting should the water level be reduced to two-thirds the core height. Establishment of the safety limit at 12 inches above the top of the fuel provides adequate margin. This level will be continuously monitored whenever the recirculation pumps are not operating.

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

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References

1. "Generic Reload Fuel Applications," NEDE-24011-P-A*
2. "Generic Information For Barrier Fuel Demonstration Bundle Licensing", NEDO-24259-A, February 1981.

*Approved revision number at time reload fuel analyses are performed.

2.1 LIMITING SAFETY SYSTEM SETTING BASIS

The abnormal operational transients applicable to operation of the units have been analyzed throughout the spectrum of planned operating conditions up to the rated thermal power condition of 2511 MWt. In addition, 2511 MWt is the licensed maximum steady-state power level of the units. This maximum steady-state power level will never knowingly be exceeded.

Conservatism incorporated into the transient analysis is documented in References 1 and 2. Transient analyses are initiated at the conditions given in these References.

The scram delay time and rate of rod insertion allowed by the analyses are conservatively set equal to the longest delay and slowest insertion rate acceptable by technical specifications. The effects of scram worth, scram delay time, and rod insertion rate, all conservatively applied, are of greatest significance in the early portion of the negative reactivity insertion. The rapid insertion of negative reactivity is assured by the time requirements for 5% and 20% insertion. By the time the rods are 60% inserted, approximately 4 dollars of negative reactivity have been inserted, which strongly turns the transient and accomplishes the desired effect. The times for 50% and 90% insertion are given to assure proper completion of the expected performance in the earlier portion of the transient, and to establish the ultimate fully shutdown steady-state condition.

The MCPR operating limit is, however, adjusted to account for the statistical variation of measured scram times as discussed in Reference 2 and the bases of Specification 3.5.K.

Steady-state operation without forced recirculation will not be permitted except during startup testing. The analysis to support operation at various power and flow relationships has considered operation with either one or two recirculation pumps.

The bases for individual trip settings are discussed in the following paragraphs.

For analyses of the thermal consequences of the transients, the MCPR's stated in Paragraph 3.5.K as the limiting condition of operation bound those which are conservatively assumed to exist prior to initiation of the transients.

A. Neutron Flux Trip Settings

1. APRM Flux Scram Trip Setting (Run Mode)

The average power range monitoring (APRM) system, which is calibrated using heat balance data taken during steady-state conditions, reads in percent of rated thermal power. Because fission chambers provide the basis input signals, the APRM system responds directly to average neutron flux. During transients, the instantaneous rate of heat transfer from the fuel (reactor thermal power) is less than the instantaneous neutron flux due to the time constant of the fuel.

Therefore, during abnormal operational transients, the thermal power of the fuel will be less than that indicated by the neutron flux at the scram setting. Analyses demonstrate that with a 120% scram trip setting, none of the abnormal operational transients analyzed violates the fuel safety limit, and there is a substantial margin from fuel damage. Therefore, the use of flow-referenced scram trip provides even additional margin.

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References

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

*Approved revision number at time reload analyses are performed

2. "Qualification of the One-Dimensional Core Transient Model for Boiling Water Reactors" General Electric Co. Licensing Topical Report NEDO 24154 Vols. I and II and NEDE-24154 Volume III as supplemented by letter dated September 5, 1980 from R. H. Buchholz (GE) to P. S. Check (NRC).

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1.2/2.1 REACTOR COOLANT SYSTEM

SAFETY LIMIT

Applicability:

Applies to limits on reactor coolant system pressure.

Objective:

To establish a limit below which the integrity of the reactor coolant system is not threatened due to an overpressure condition.

LIMITING SAFETY SYSTEM SETTING

Applicability:

Applies to trip settings of the instruments and devices which are provided to prevent the reactor system safety limits from being exceeded.

Objective:

To define the level of the process variables at which automatic protective action is initiated to prevent the safety limits from being exceeded.

SPECIFICATIONS

- A. The reactor coolant system pressure as measured by the vessel steam space pressure indicator shall not exceed 1145 psig at any time when irradiated fuel is present in the reactor vessel.

- A. Reactor coolant high-pressure scram shall be ≤ 1060 psig.

- B. Primary system safety valve nominal settings shall be as follows:

- 1 valve at 1115 psig"
- 2 valves at 1240 psig
- 2 valves at 1250 psig
- 4 valves at 1260 psig

"Target Rock combination safety/relief valve

The allowable setpoint error for each valve shall be $\pm 1\%$.

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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 1345 psig as measured by the vessel steam space pressure indicator is equivalent to 1375 psig at the lowest elevation of the reactor vessel. 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 ($110\% \times 1250 = 1375$ psig), and the USASI Code permits pressure transients up to 20% over design pressure ($120\% \times 1175 = 1410$ psig). The safety limit pressure of 1375 psig is referenced to the lowest evaluation of the reactor vessel. The design pressure for the recirc. suction line piping (1175 psig) was chosen relative to the reactor vessel design pressure. Demonstrating compliance of peak vessel pressure with the ASME overpressure protection limit (1375 psig) assures compliance of the suction piping with the USASI limit (1410 psig). Evaluation methodology 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 similar margin of protection at the established safety pressure limit.

The normal operating pressure 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 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 fail.

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Finally, the safety valves are sized to keep the reactor vessel peak 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 allowable peak 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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sidered inoperable, fully inserted into the core, and electrically disarmed.

5. If the overall average of the 20% insertion scram time data generated to date in the current cycle exceeds 0.73 seconds, the MCPR operating limit must be modified as required by Specification 3.5.K.

provide reasonable assurance that proper control rod drive performance is being maintained. The results of measurements performed on the control rod drives shall be submitted in the annual operating report to the NRC.

5. The cycle cumulative mean scram time for 20% insertion will be determined immediately following the testing required in Specifications 4.3.C.1 and 4.3.C.2 and the MCPR operating limit adjusted, if necessary, as required by Specification 3.5.K.

D. Control Rod Accumulators

At all reactor operating pressures, a rod accumulator may be inoperable provided that no other control rod in the nine-rod square array around this rod has:

1. an inoperable accumulator,
2. a directional control valve electrically disarmed while in a nonfully inserted position, or
3. a scram insertion greater than maximum permissible insertion time.

If a control rod with an inoperable accumulator is inserted full-in and its directional control valves are electrically disarmed, it shall not be considered to have an inoperable accumulator, and the rod block associated with that inoperable accumulator may be bypassed.

E. Reactivity Anomalies

The reactivity equivalent of the difference between the actual critical rod configuration and the expected configuration during power operation shall not exceed $1\% \Delta k$. If this limit is exceeded, the reactor shall be shutdown until the cause has been determined and corrective actions have been taken. In accordance with Specification 6.6, the NRC shall be notified of this reportable occurrence within 24 hours.

F. Economic Generation Control System

Operation of the unit with the economic generation control system with automatic flow control shall be permissible only in the range of 65% to 100% of rated core flow, with reactor power above 20%.

D. Control Rod Accumulators

Once a shift, check the status of the pressure and level alarms for each accumulator.

E. Reactivity Anomalies

During the startup test program and startups following refueling outages, the critical rod configurations will be compared to the expected configurations at selected operating conditions. These comparisons will be used as base data for reactivity monitoring during subsequent power operation throughout the fuel cycle. At specific power operating conditions, the critical rod configuration will be compared to the configuration expected based upon appropriately corrected past data. This comparison will be made at least every equivalent full power month.

F. Economic Generation Control System

The range set into the economic generation control system shall be recorded weekly.

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. It is necessary to raise the MCPR operating limit (per Specification 3.5.K) when the average 20% scram insertion time reaches 0.73 seconds on a cycle cumulative basis (overall average of surveillance data to date) in order to comply with assumptions in the implementation procedure for the ODYN transient analysis computer code. The basis for choosing 0.73 seconds is discussed further in the bases for Specification 3.5.K. In the analytical treatment of the transients, 290 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 210 milliseconds. Approximately 90 milliseconds after neutron flux reaches the trip point, the pilot scram valve solenoid deenergizes and 120 milliseconds later the control rod motion is estimated to actually begin. However, 200 milliseconds rather than 120 milliseconds is conservatively assumed for this time interval in the transient analyses and is also 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.

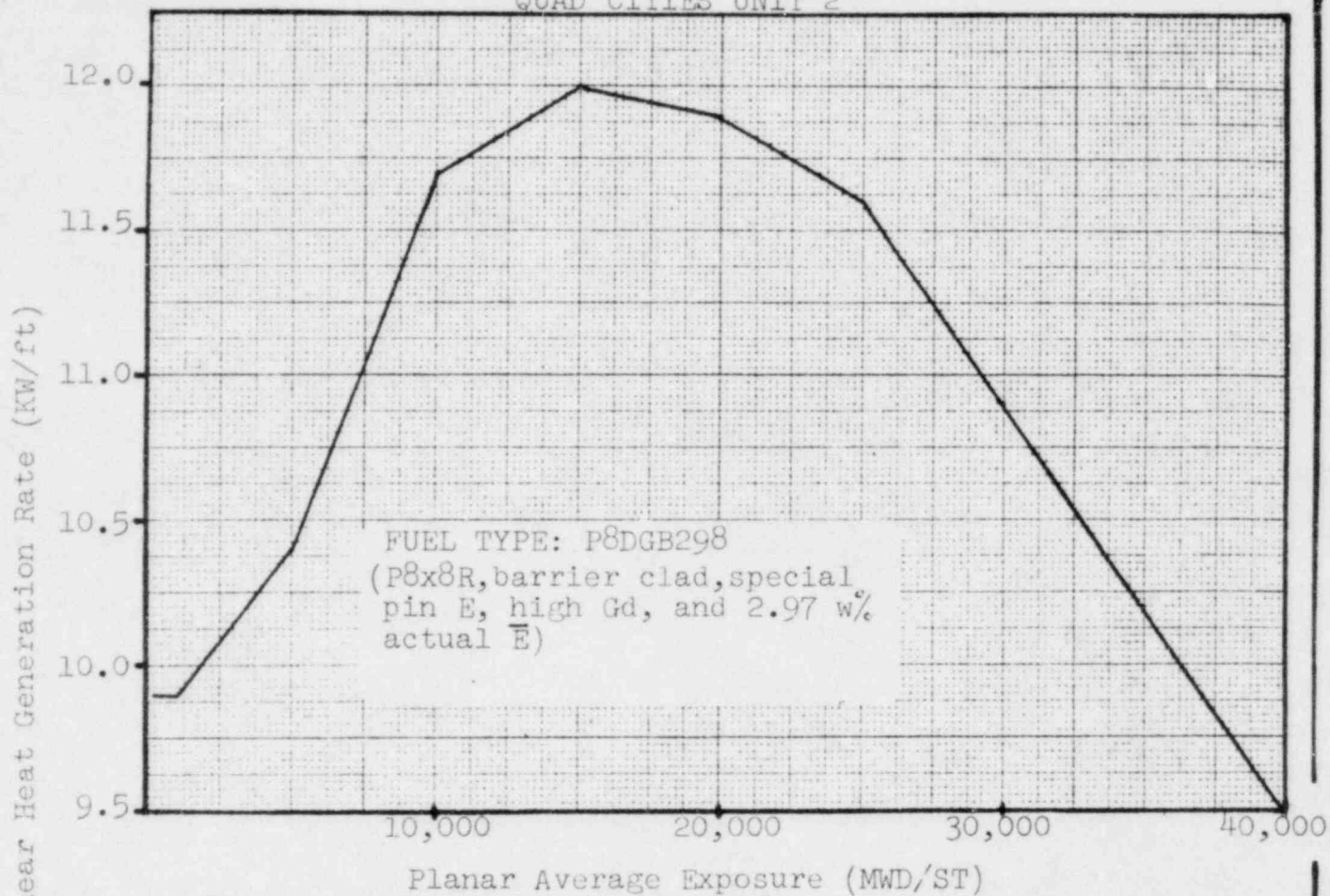


Figure 3.5-1
(Sheet 1 of 5)

Maximum Average Planar Linear Heat
Generation Rate (MAPLHGR)
vs. Planar Average Exposure

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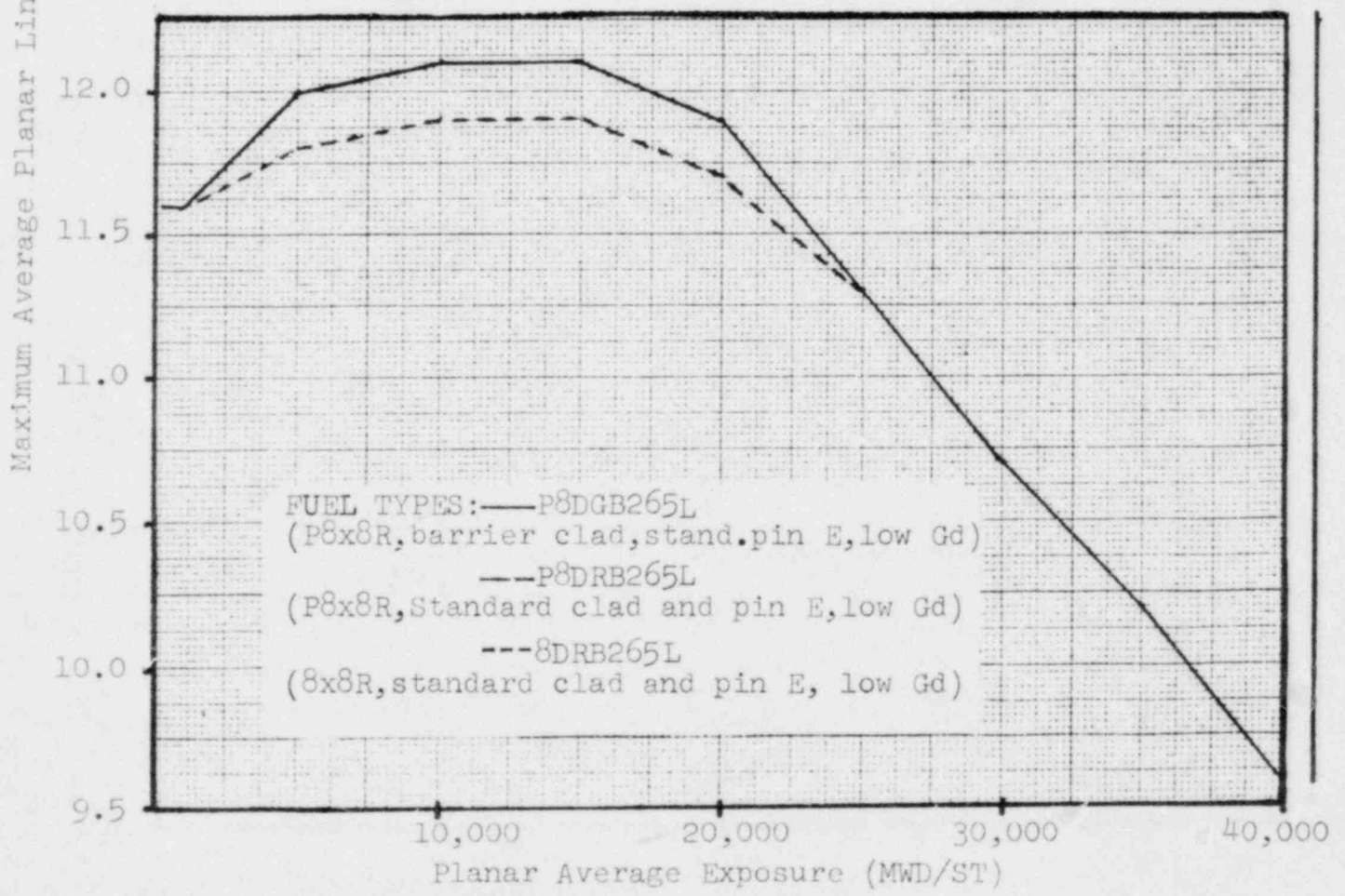
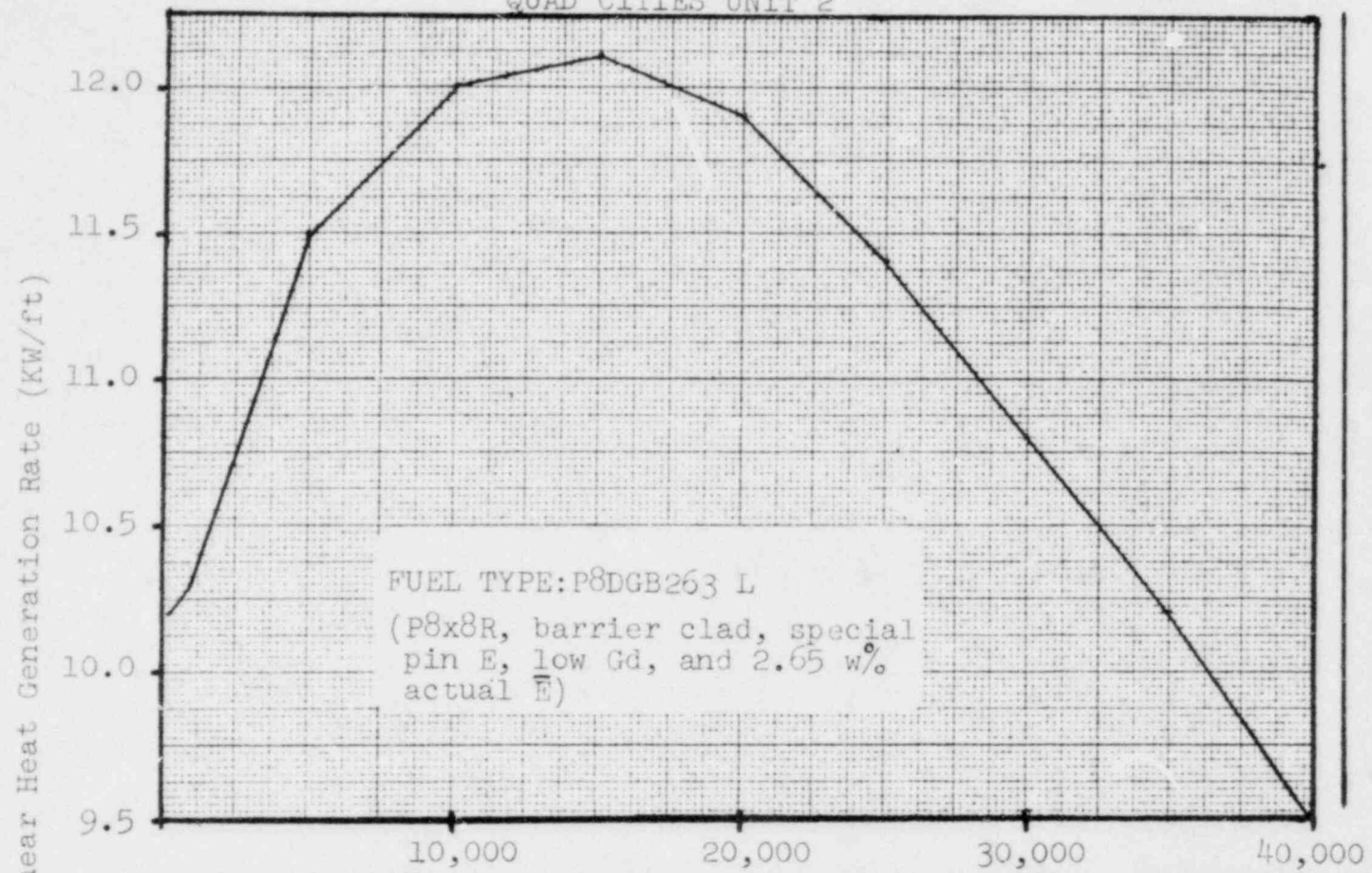


Figure 3.5-1 Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) vs. Planar Average Exposure

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Maximum Average Planar Linear Heat Generation Rate (KW/ft)

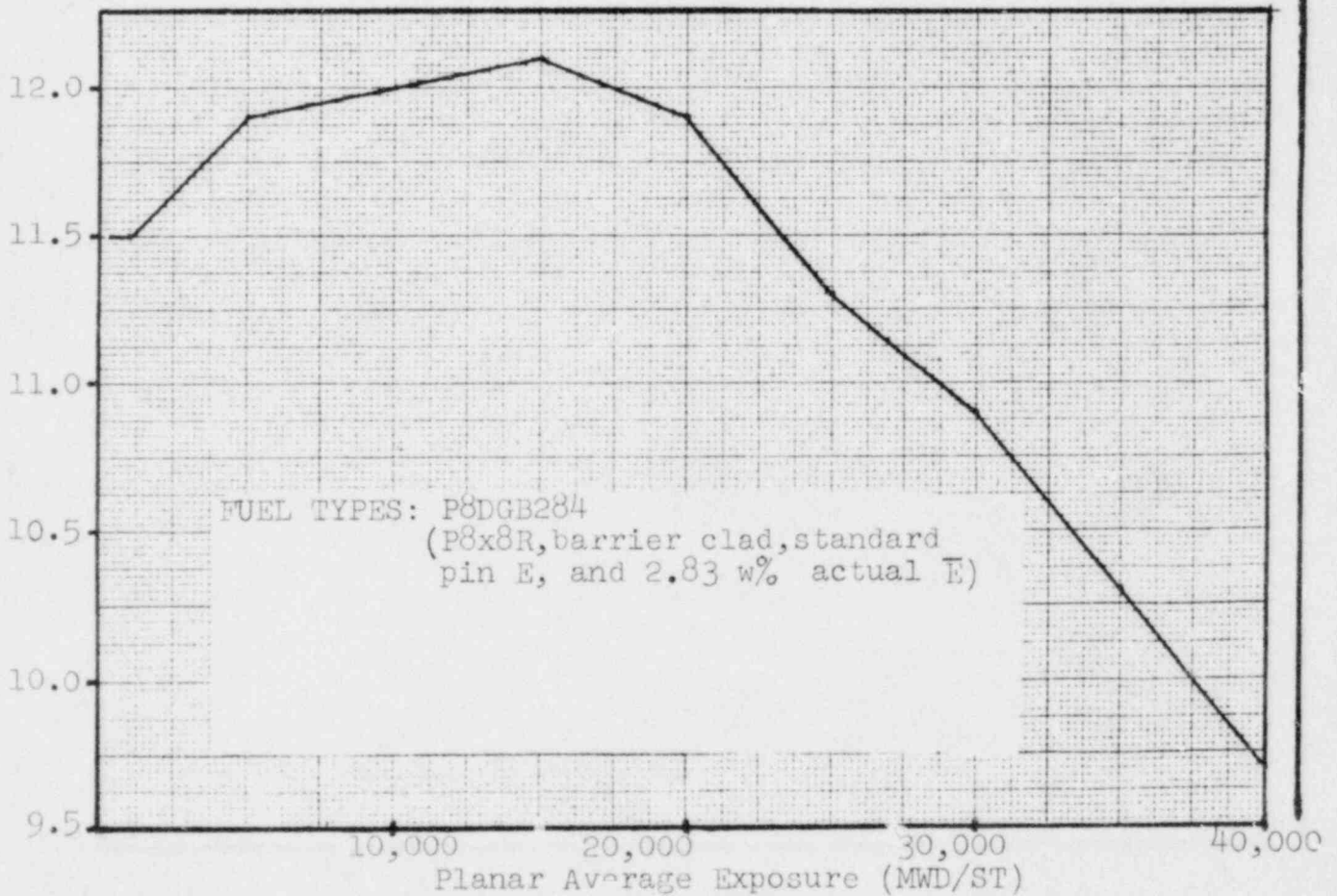
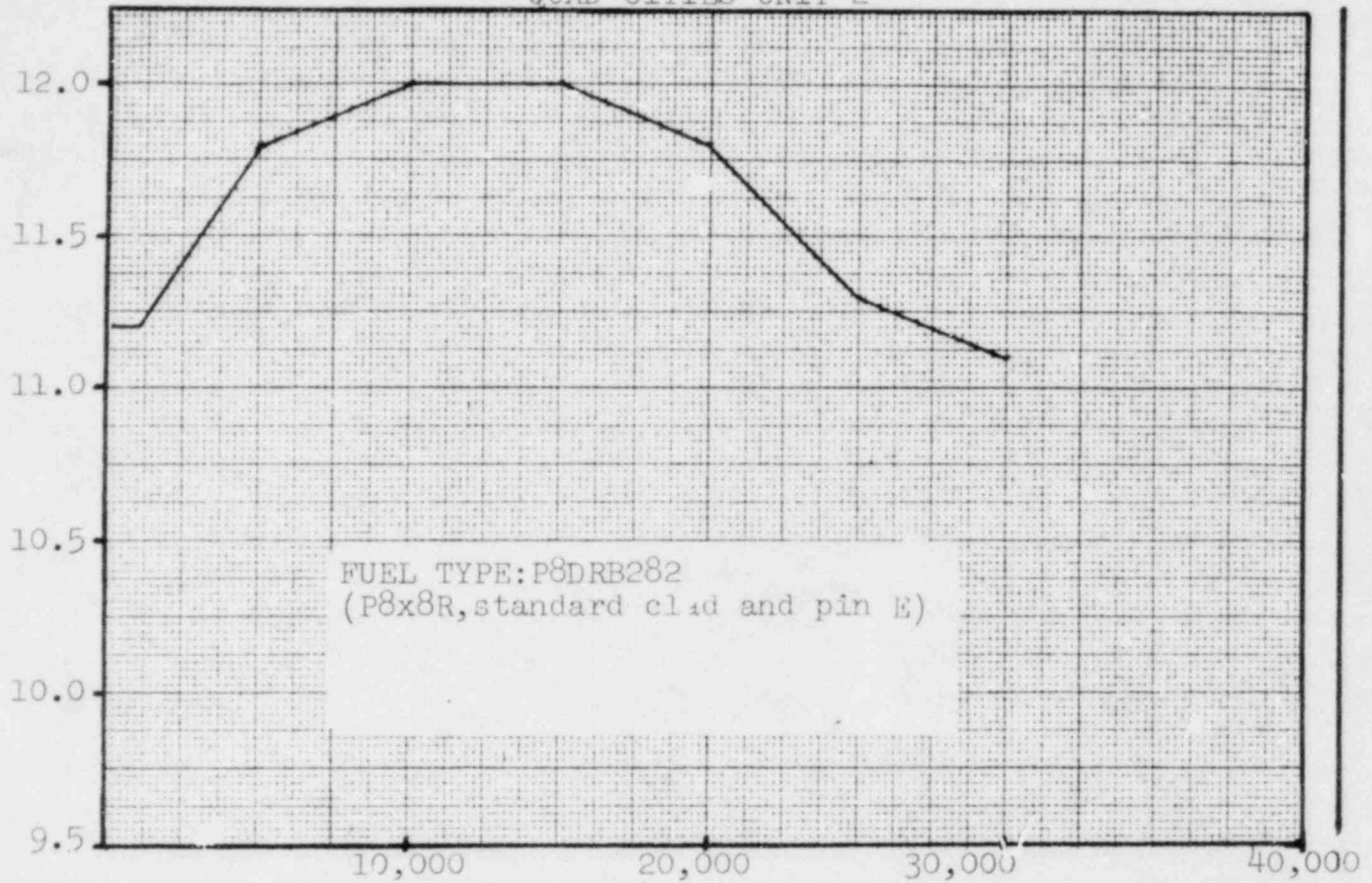


Figure 3.5-1
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Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) vs. Planar Average Exposure

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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.

K. Minimum Critical Power Ratio (MCPR)

During steady-state operation at rated core flow, MCPR shall be greater than or equal to:

$$1.37 \text{ for } \tau_{ave} \leq 0.73 \text{ secs}$$

$$1.42 \text{ for } \tau_{ave} \geq 0.86 \text{ secs}$$

$$0.385 \tau_{ave} + 1.089 \\ \text{for } 0.73 < \tau_{ave} < 0.86 \text{ secs}$$

where τ_{ave} = mean 20% scram insertion time for all surveillance data from Specification 4.3.C. which has been generated in the current cycle.

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. If 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.

K. Minimum Critical Power Ratio (MCPR)

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

shown on Figure 3.5-1 as limits because conformance calculations have not been performed to justify operation at LHGR's in excess of those shown.

J. Local LHGR

This specification assures that the maximum linear heat-generation rate in any rod is less than the design linear heat-generation rate even if fuel pellet densification is postulated. The power spike penalty is discussed in Reference 2 and assumes a linearly increasing variation in axial gaps between core bottom and top and assures with 95% confidence that no more than one fuel rod exceeds the design LHGR due to power spiking. No penalty is required in Specification 3.5.L because it has been accounted for in the reload transient analyses by increasing the calculated peak LHGR by 2.2%.

K. Minimum Critical Power Ratio (MCPR)

The steady state values for MCPR specified in this specification were selected to provide margin to accommodate transients and uncertainties in monitoring the core operating state as well as uncertainties in the critical power correlation itself. These values also assure that operation will be such that the initial condition assumed for the LOCA analysis plus two percent for uncertainty is satisfied. For any of the special set of transients or disturbances caused by single operator error or single equipment malfunction, it is required that design analyses initialized at this steady-state operating limit yield a MCPR of not less than that specified in Specification 1.1.A at any time during the transient, assuming instrument trip settings given in Specification 2.1. For analysis of the thermal consequences of these transients, the value of MCPR stated in this specification for the limiting condition of operation bounds the initial value of MCPR assumed to exist prior to the initiation of the transients. This initial condition, which is used in the transient analyses, will preclude violation of the fuel cladding integrity safety limit. Assumptions and methods used in calculating the required steady state MCPR limit for each reload cycle are documented in References 2, 4, and 5. The results apply with increased conservatism while operating with MCPR's greater than specified.

The most limiting transients with respect to MCPR are generally:

- a) Rod withdrawal error
- b) Load rejection or turbine trip without bypass
- c) Loss of feedwater heater

Several factors influence which of these transients results in the largest reduction in critical power ratio such as the specific fuel loading, exposure, and fuel type. The current cycle's reload licensing analyses specifies the limiting transients for a given exposure increment for each fuel type. The values specified as the

Limiting Condition of Operation are conservatively chosen to bound the most restrictive over the entire cycle for each fuel type.

The need to adjust the MCPR operating limit as a function of scram time arises from the statistical approach used in the implementation of the ODYN computer code for analyzing rapid pressurization events. Generic statistical analyses were performed for plant groupings of similar design which considered the statistical variation in several parameters (initial power level, CRD scram insertion time, and model uncertainty). These analyses (which are described further in Reference 4) produced generic Statistical Adjustment Factors which have been applied to plant and cycle specific ODYN results to yield operating limits which provide a 95% probability with 95% confidence that the limiting pressurization event will not cause MCPR to fall below the fuel cladding integrity safety limit.

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As a result of this 95/95 approach, the average 20% insertion scram time must be monitored to assure compliance with the assumed statistical distribution. If the mean value on a cycle cumulative (running average) basis were to exceed a 5% significance level compared to the distribution assumed in the ODYN statistical analyses, the MCPR limit must be increased linearly (as a function of the mean 20% scram time) to a more conservative value which reflects an NRC determined uncertainty penalty of 4.4%. This penalty is applied to the plant specific ODYN results (i.e. without statistical adjustment) for the limiting single failure pressurization event occurring at the limiting point in the cycle. It is not applied in full until the mean of all current cycle 20% scram times reaches the 0.90 secs value of Specification 3.3.3.C.1. In practice, however, the requirements of 3.3.C.1 would most likely be reached (i.e. individual data set average > .90 secs) and the required actions taken (3.3.C.2) well before the running average exceeds 0.90 secs.

The 5% significance level is defined in Reference 4 as:

$$\tau_B = \mu + 1.65 (N_1 / \sum_{i=1}^n N_i)^{1/2} \sigma$$

where μ = mean value for statistical scram time distribution to 20% inserted

σ = standard deviation of above distribution

N_1 = number of rods tested at BOC (all operable rods)

$\sum_{i=1}^n N_i$ = total number of operable rods tested in the current cycle

The value for τ_B used in Specification 3.5.k is 0.73 secs which is conservative for the following reasons:

- a) For simplicity in formulating and implementing the LCO, a conservative value for $\sum_{i=1}^n N_i$ of 708 (i.e. 4x177) was used. This represents one full core data set at BOC plus 6 half core data sets. At the maximum frequency allowed by Specification 4.3.C.2 (16 week intervals) this is equivalent to 24 operating months. That is, a cycle length was assumed which is longer than any past or contemplated refueling interval and the number of rods tested was maximized in order to simplify and conservatively reduce the criteria for the scram time at which MCPR penalization is necessary.
- b) The values of μ and σ were also chosen conservatively based on the dropout of the position 39 RPIS switch, since pos. 38.4 is the precise point at which 20% insertion is reached. As a result Specification 3.5.k initiates the linear MCPR penalty at a slightly lower value τ_{ave} . This also produces the full 4.4% penalty at 0.86 secs which would occur sooner than the required value of 0.90 secs.

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For core flow rates less than rated, the steady state MCPR is increased by the formula given in the specification. This ensures that the MCPR will be maintained greater than that specified in Specification 1.1.A even in the event that the motor-generator set speed controller causes the scoop tube positoner for the fluid coupler to move to the maximum speed position.

References

1. "Loss-of-Coolant Analysis Report for Dresden Units 2, 3, and Quad Cities Units 1, 2 Nuclear Power Stations," NEDO-24146A*, April, 1979
2. "Generic Reload Fuel Application," NEDE-24011-P-A**
3. I. M. Jacobs and P. W. Marriott, GE Topical Report APED 5736, "Guidelines for Determining Safe Test Intervals and Repair Times for Engineered Safeguards," April, 1969.
4. "Qualification of the One-Dimensional Core Transient Model for Boiling Water Reactors" General Electric Co. Licensing Topical Report NEDO 24154 Vols. I and II and NEDE-24154 Vol. III as supplemented by letter dated September 5, 1980 from R. H. Buchholz (GE) to P. S. Check (NRC).
5. Letter, R. H. Buchholz (GE) to P. S. Check (NRC) dated January 19, 1981 "ODYN Adjustment Methods For Determination of Operating Limits".

* Approved revision at time of plant operation.

** Approved revision number at time reload fuel analyses are performed.

Attachment 2

ERRATA AND ADDENDA SHEET NO. 5 to NEDO-24146A

ERRATA AND ADDENDA SHEET NO. 6 to NEDO-24146A