

# INDEX

## LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>
3/4.0 <u>APPLICABILITY</u> .....	3/4 0-1
3/4.1 <u>REACTIVITY CONTROL SYSTEMS</u>	
3/4.1.1 SHUTDOWN MARGIN.....	3/4 1-1
3/4.1.2 REACTIVITY ANOMALIES.....	3/4 1-2
3/4.1.3 CONTROL RODS	
Control Rod Operability.....	3/4 1-3
Control Rod Maximum Scram Insertion Times.....	3/4 1-5
Control Rod Average Scram Insertion Times.....	3/4 1-6
Four Control Rod Group Insertion Times.....	3/4 1-7
Control Rod Scram Accumulators.....	3/4 1-8
Control Rod Drive Coupling.....	3/4 1-9
Control Rod Position Indication.....	3/4 1-11
Control Rod Drive Housing Support.....	3/4 1-13
3/4.1.4 CONTROL ROD PROGRAM CONTROLS	
Rod Worth Minimizer.....	3/4 1-14
Rod Sequence Control System.....	3/4 1-15
Rod Block Monitor.....	3/4 1-17
3/4.1.5 STANDBY LIQUID CONTROL SYSTEM.....	3/4 1-18
3/4.2 <u>POWER DISTRIBUTION LIMITS</u>	
3/4.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE.....	3/4 2-1
3/4.2.2 APRM SETPOINTS.....	3/4 2-8
3/4.2.3 MINIMUM CRITICAL POWER RATIO.....	3/4 2-9
3/4.2.4 LINEAR HEAT GENERATION RATE.....	3/4 2-15

## REACTIVITY CONTROL SYSTEMS

### CONTROL ROD AVERAGE SCRAM INSERTION TIMES

#### LIMITING CONDITIONS FOR OPERATION

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3.1.3.3 The average scram insertion time of all OPERABLE control rods from the fully withdrawn position, based on de-energization of the scram pilot valve solenoids as time zero, shall not exceed any of the following:

<u>Position Inserted From Fully Withdrawn</u>	<u>Average Scram Inser- tion Time (Seconds)</u>
46	0.31
36	1.05
26	1.82
6	3.37

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

#### ACTION:

With the average scram insertion time exceeding any of the above limits, be in at least HOT SHUTDOWN within 12 hours.

#### SURVEILLANCE REQUIREMENTS

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4.1.3.3 All control rods shall be demonstrated OPERABLE by scram time testing from the fully withdrawn position as required by Surveillance Requirement 4.1.3.2.

## REACTIVITY CONTROL SYSTEMS

### FOUR CONTROL ROD GROUP SCRAM INSERTION TIMES

#### LIMITING CONDITION FOR OPERATION

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3.1.3.4 The average scram insertion time, from the fully withdrawn position, for the three fastest control rods in each group of four control rods arranged in a two-by-two array, based on deenergization of the scram pilot valve solenoids as time zero, shall not exceed any of the following:

<u>Position Inserted From Fully Withdrawn</u>	<u>Average Scram Insertion Time (Seconds)</u>
46	0.33
36	1.12
26	1.93
6	3.58

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

#### ACTION:

With the average scram insertion times of control rods exceeding the above limits, operation may continue and the provisions of Specification 3.0.4 are not applicable provided:

- a. The control rods with the slower than average scram insertion times are declared inoperable,
- b. The requirements of Specification 3.1.3.1 are satisfied, and
- c. The Surveillance Requirements of Specification 4.1.3.2.c are performed at least once per 92 days when operation is continued with three or more control rods with slow scram insertion times.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

#### SURVEILLANCE REQUIREMENTS

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4.1.3.4 All control rods shall be demonstrated OPERABLE by scram time testing from the fully withdrawn position as required by Surveillance Requirement 4.1.3.2.

### 3/4.2 POWER DISTRIBUTION LIMITS

#### 3/4.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE

##### LIMITING CONDITION FOR OPERATION

---

3.2.1 All AVERAGE PLANAR LINEAR HEAT GENERATION RATES (APLHGR's) for each type of fuel as a function of AVERAGE PLANAR EXPOSURE shall not exceed the following limits:

- a. During two recirculation loop operation, the limits are shown in Figures 3.2.1-1, 3.2.1-2, 3.2.1-3, 3.2.1-4, 3.2.1-5, and 3.2.1-6.

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER.

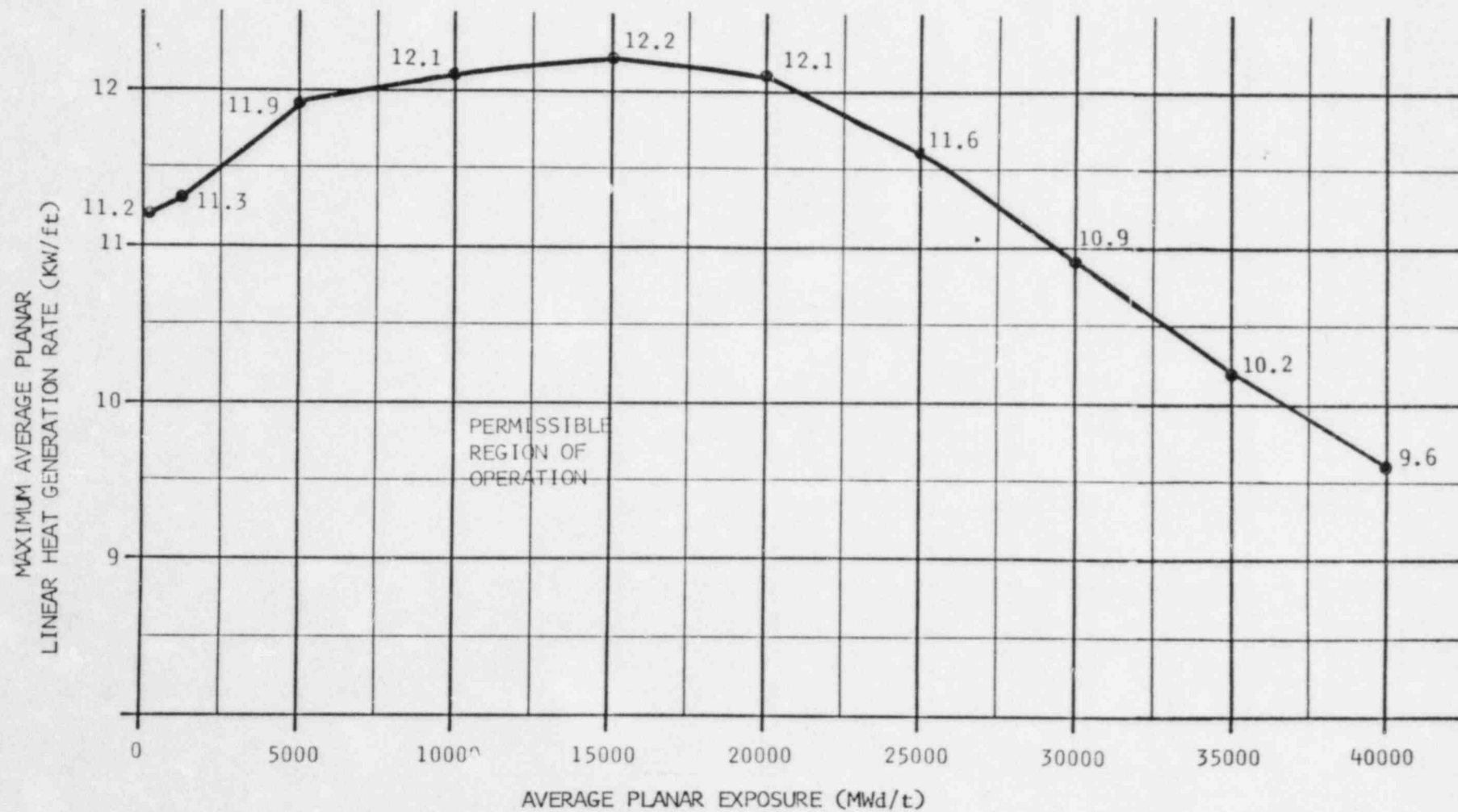
ACTION: With an APLHGR exceeding the limits of Figures 3.2.1-1, 3.2.1-2, 3.2.1-3, 3.2.1-4, 3.2.1-5, and 3.2.1-6, initiate corrective action within 15 minutes and continue corrective action so that APLHGR is within the limit within 4 hours or reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

##### SURVEILLANCE REQUIREMENTS

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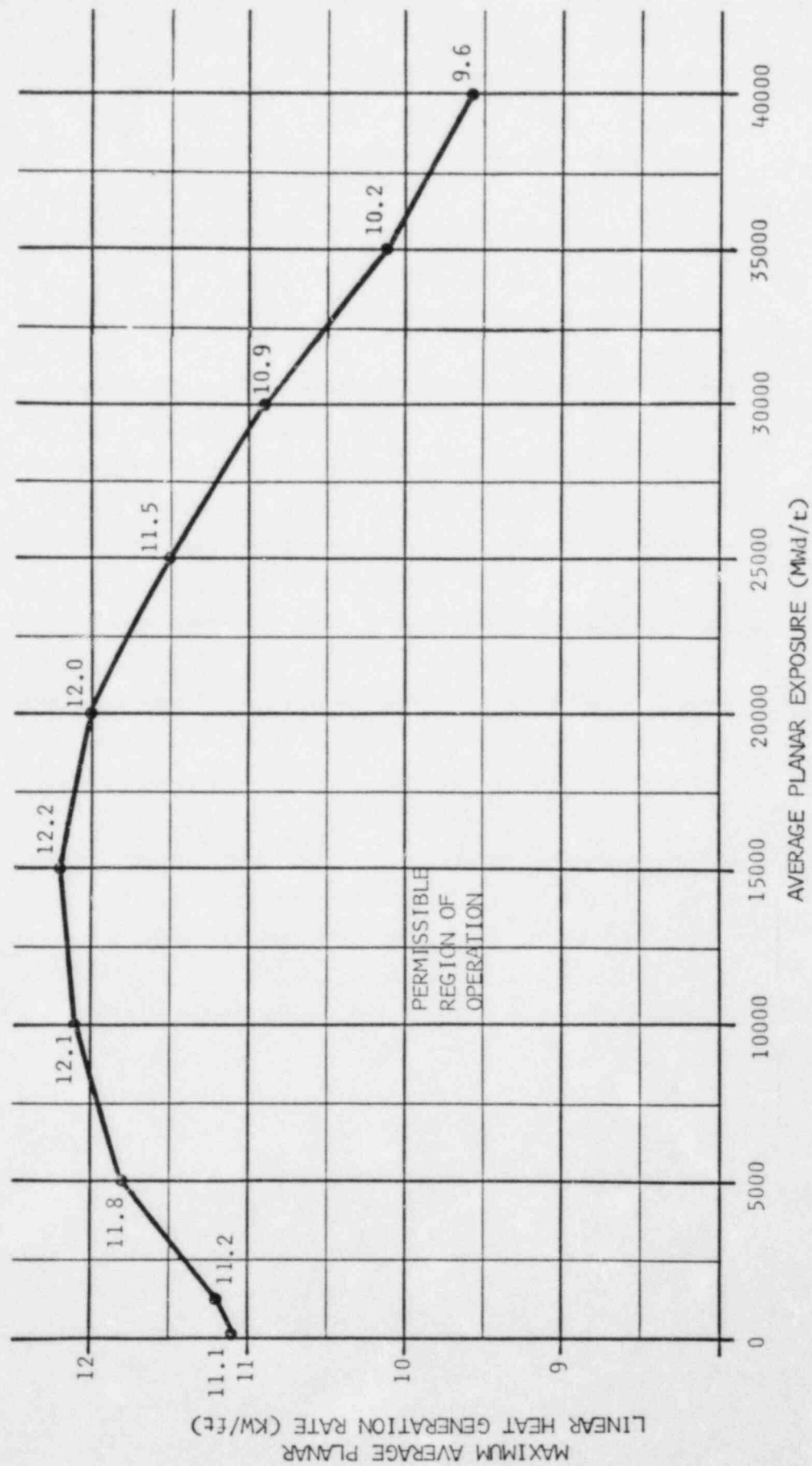
4.2.1 All APLHGR's shall be verified to be equal to or less than the applicable limit determined from Figures 3.2.1-1, 3.2.1-2, 3.2.1-3, 3.2.1-4, 3.2.1-5, and 3.2.1-6:

- a. At least once per 24 hours,
- b. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and
- c. Initially and at least once per 12 hours when the reactor is operating with a LIMITING CONTROL ROD PATTERN for APLHGR.



FUEL TYPE 8D274L (8X8)  
MAXIMUM AVERAGE PLANAR LINEAR HEAT  
GENERATION RATE (MAPLHGR)  
VERSUS AVERAGE PLANAR EXPOSURE

FIGURE 3.2.1-1



FUEL TYPE 8D274H (8X8)  
MAXIMUM AVERAGE PLANAR LINEAR HEAT  
GENERATION RATE (MAPLHGR)  
VERSUS AVERAGE PLANAR EXPOSURE

FIGURE 3.2.1-2



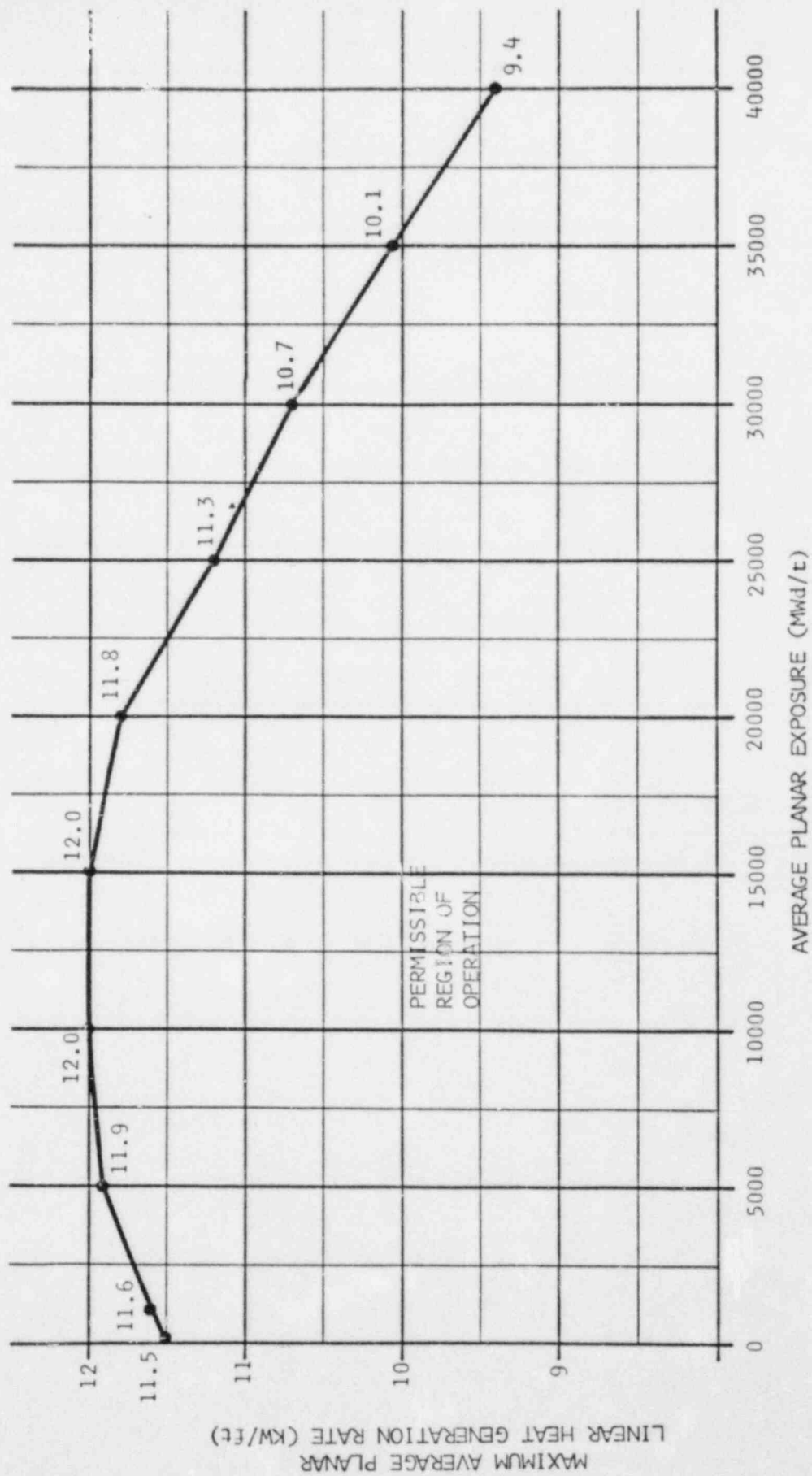
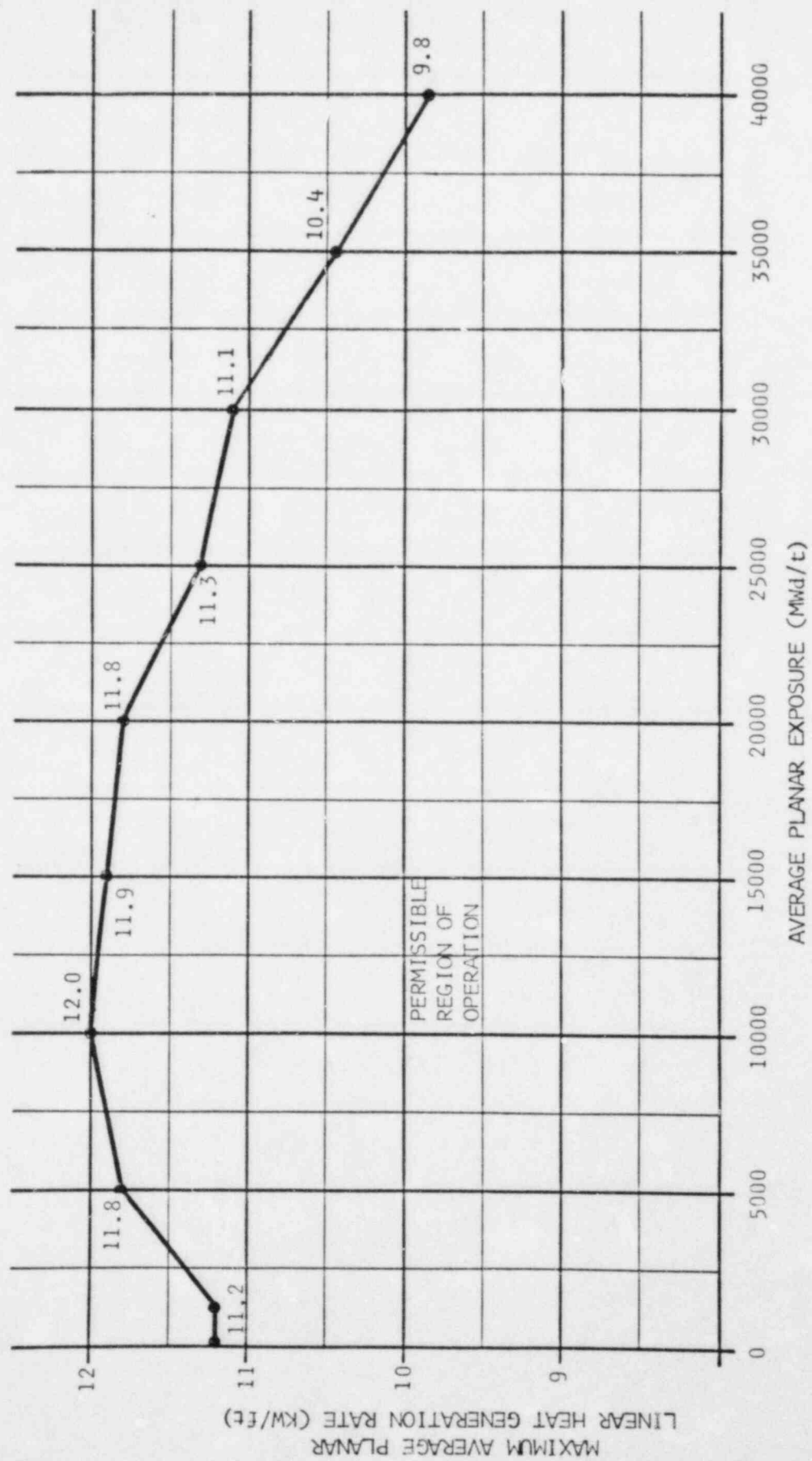


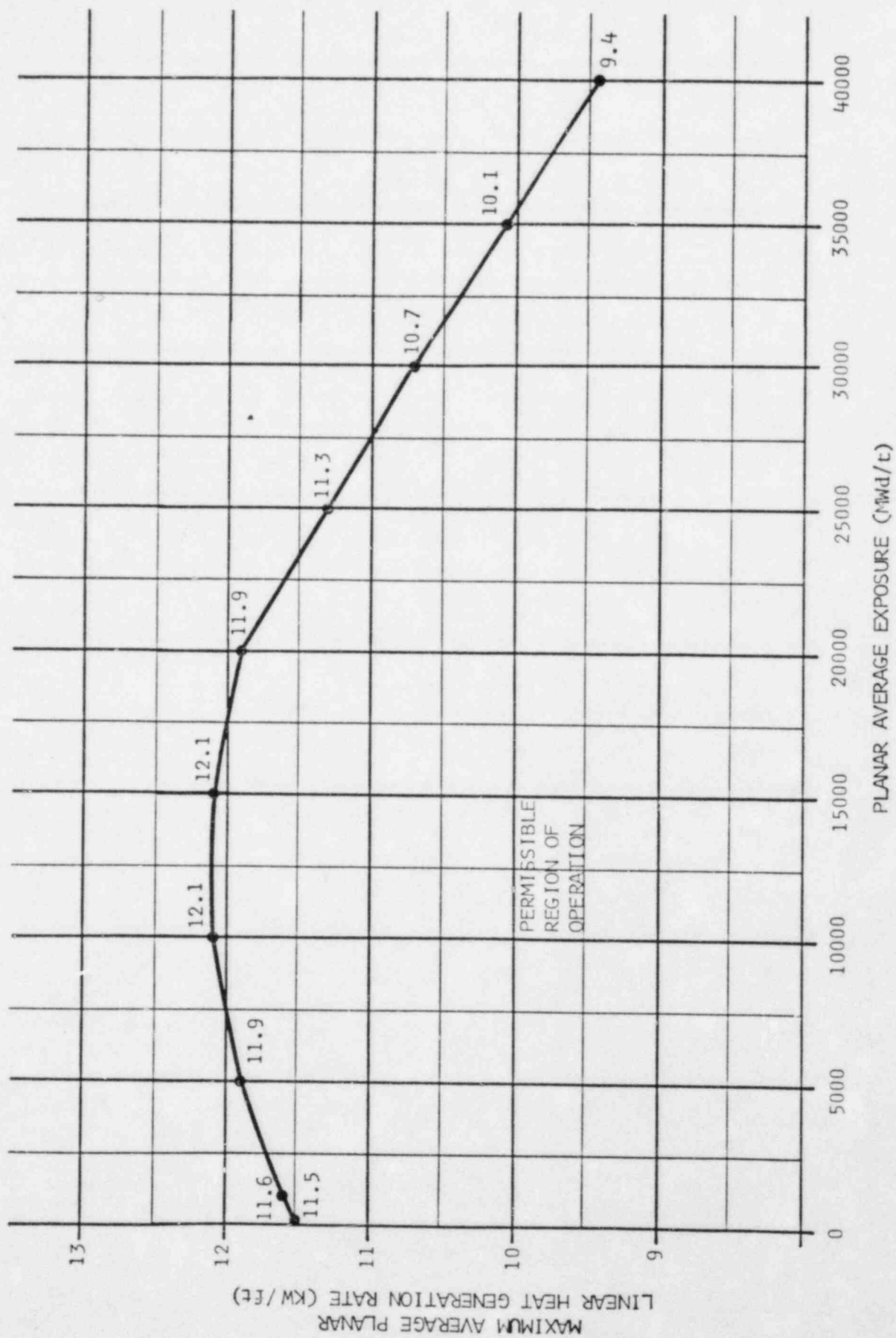
FIGURE 3.2.1-3



FUEL TYPE 8DRB283 (8X8R)  
MAXIMUM AVERAGE PLANAR LINEAR HEAT  
GENERATION RATE (MAPLHGR)  
VERSUS AVERAGE PLANAR EXPOSURE

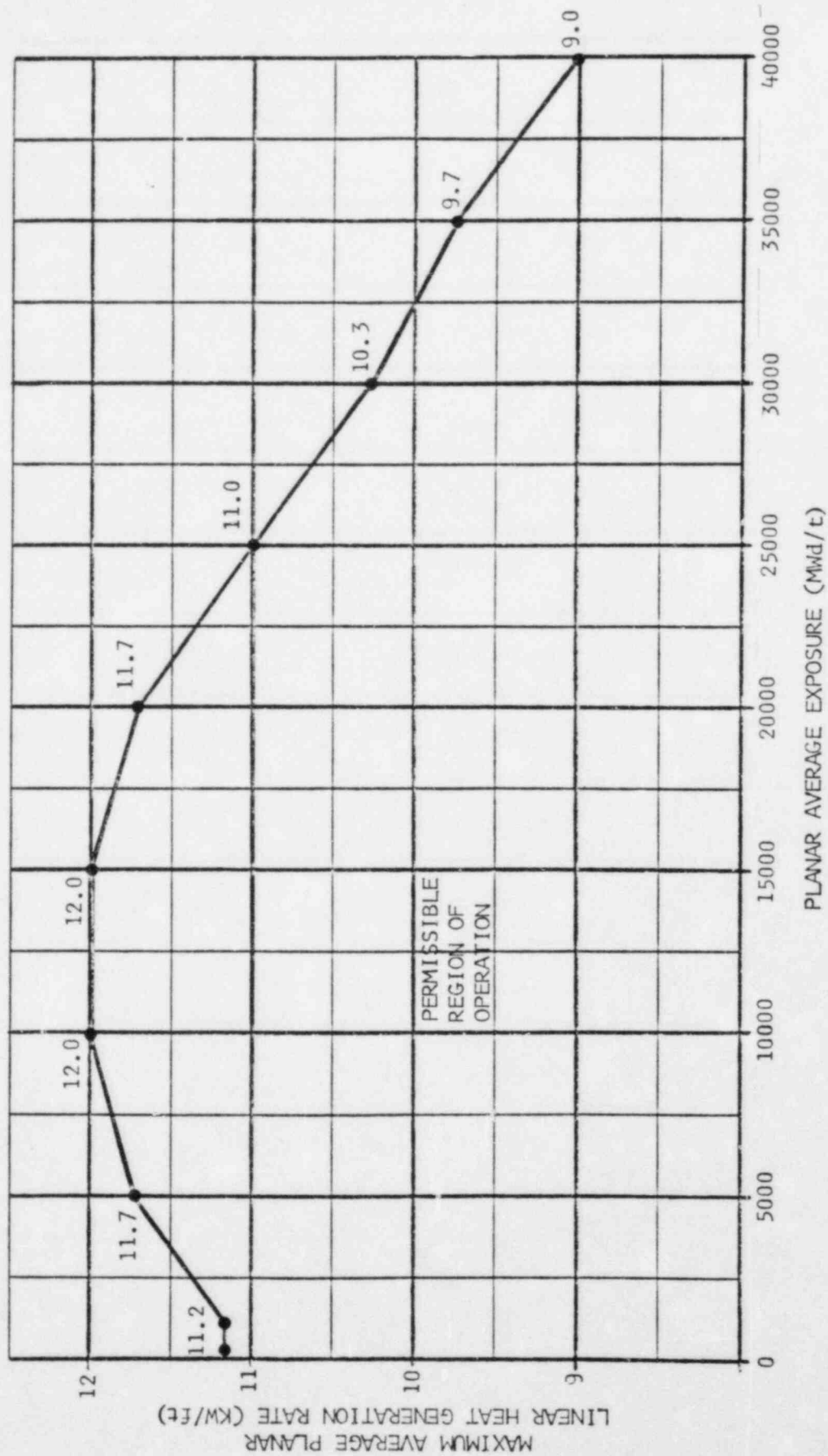
FIGURE 3.2.1-4





FUEL TYPE P8DRB265H (P8X8R)  
 MAXIMUM AVERAGE PLANAR LINEAR HEAT  
 GENERATION RATE (MAPLHGR)  
 VERSUS PLANAR AVERAGE EXPOSURE

FIGURE 3.2.1-5



FUEL TYPE P8DRB284H (P8X8R)  
 MAXIMUM AVERAGE PLANAR LINEAR HEAT  
 GENERATION RATE (MAPLHGR)  
 VERSUS AVERAGE PLANAR EXPOSURE

FIGURE 3.2.1-6

## POWER DISTRIBUTION LIMITS

### 3/4.2.2 APRM SETPOINTS

#### LIMITING CONDITION FOR OPERATION

3.2.2 The flow-biased APRM scram trip setpoint (S) and rod block trip setpoint ( $S_{RB}$ ) shall be established according to the following relationships:

$$S \leq (0.66W + 54\%) T$$

$$S_{RB} \leq (0.66W + 42\%) T$$

where: S and  $S_{RB}$  are in percent of RATED THERMAL POWER,  
W = Loop recirculation flow in percent of rated flow,  
T = Lowest value of the ratio of design TPF divided by the MTPF obtained for any class of fuel in the core ( $T \leq 1.0$ ), and

Design TPF for: P8 X 8R fuel = 2.39  
8 X 8R fuel = 2.39  
8 X 8 fuel = 2.43

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER.

#### ACTION:

With S or  $S_{RB}$  exceeding the allowable value, initiate corrective action within 15 minutes and continue corrective action so that S and  $S_{RB}$  are within the required limits within 4 hours, or reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

#### SURVEILLANCE REQUIREMENTS

4.2.2 The MTPF for each class of fuel shall be determined, the value of T calculated, and the flow-biased APRM trip setpoint adjusted, as required:

- a. At least once per 24 hours,
- b. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and
- c. Initially and at least once per 12 hours when the reactor is operating with a LIMITING CONTROL ROD PATTERN for MTPF.

## POWER DISTRIBUTION LIMITS

### 3/4.2.3 MINIMUM CRITICAL POWER RATIO

#### LIMITING CONDITION FOR OPERATION

---

3.2.3.1 The MINIMUM CRITICAL POWER RATIO (MCPR), as a function of core flow, shall be equal to or greater than the MCPR limit times the  $K_f$  shown in Figure 3.2.3-1, provided that the end-of-cycle recirculation pump trip system is OPERABLE per specification 3.3.6.2, with:

- a. If ODYN OPTION A analyses are in effect, the MCPR limits are listed below:
  1. MCPR for 8x8 fuel = 1.29
  2. MCPR for 8x8R fuel = 1.27
  3. MCPR for P8x8R fuel = 1.29
- b. If ODYN OPTION B analyses are in effect (refer to Specification 3.2.3.2), the MCPR limits are listed below:
  1. MCPR for 8x8 fuel = 1.29
  2. MCPR for 8x8R fuel = 1.21
  3. MCPR for P8x8R fuel = 1.22

APPLICABILITY: OPERATIONAL CONDITION 1 when THERMAL POWER is greater than or equal to 25% RATED THERMAL POWER

#### ACTION:

- a. With the end-of-cycle recirculation trip system inoperable per Specification 3.3.6.2, operation may continue and the provisions of Specification 3.0.4 are not applicable with the following MCPR limit adjustments:
  1. Beginning-of-cycle (BOC) to end-of-cycle (EOC) minus 2000 MWD/t, within one hour determine that MCPR, as a function of core flow, is equal to or greater than the MCPR limit times the  $K_f$  shown in Figure 3.2.3-1 with:
    - a. If ODYN OPTION A analyses are in effect, the MCPR limits are listed below:
      1. MCPR for 8x8 fuel = 1.29
      2. MCPR for 8x8R fuel = 1.26
      3. MCPR for P8x8R fuel = 1.28
    - b. If ODYN OPTION B analyses are in effect (refer to Specification 3.2.3.2), the MCPR limits are listed below:
      1. MCPR for 8x8 fuel = 1.29
      2. MCPR for 8x8R fuel = 1.25
      3. MCPR for P8x8R fuel = 1.28

## POWER DISTRIBUTION LIMITS

### LIMITING CONDITION FOR OPERATION (Continued)

#### ACTION (Continued)

2. EOC minus 2000 MWD/t to EOC, within one hour determine that MCPR, as a function of core flow, is equal to or greater than the MCPR limit times the  $K_f$  shown in Figure 3.2.3-1 with:
  - a. If ODYN OPTION A analyses are in effect, the MCPR limits are listed below:
    1. MCPR for 8x8 fuel = 1.37
    2. MCPR for 8x8R fuel = 1.38
    3. MCPR for P8x8R fuel = 1.41
  - b. If ODYN OPTION B analyses are in effect (refer to Specification 3.2.3.2), the MCPR limits are listed below:
    1. MCPR for 8x8 fuel = 1.29
    2. MCPR for 8x8R fuel = 1.26
    3. MCPR for P8x8R fuel = 1.29
- b. With MCPR, as a function of core flow, less than the applicable limit determined from Figure 3.2.3-1 initiate corrective action within 15 minutes and restore MCPR to within the applicable limit within 4 hours or reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

#### SURVEILLANCE REQUIREMENTS

- 4.2.3.1 MCPR, as a function of core flow, shall be determined to be equal to or greater than the applicable limit determined from Figure 3.2.3-1:
  - a. At least once per 24 hours,
  - b. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and
  - c. Initially and at least once per 12 hours when the reactor is operating in a LIMITING CONTROL ROD PATTERN for MCPR.

## POWER DISTRIBUTION LIMITS

### 3/4.2.3 MINIMUM CRITICAL POWER RATIO (ODYN OPTION B)

#### LIMITING CONDITION FOR OPERATION

---

3.2.3.2 For the OPTION B MCPR limits listed in Specification 3.2.3.1 to be used, the cycle average 20% scram time ( $\tau_{ave}$ ) shall be less than or equal to the Option B scram time limit ( $\tau_B$ ), where  $\tau_{ave}$  and  $\tau_B$  are determined as follows:

$$\tau_{ave} = \frac{\sum_{i=1}^n N_i \tau_i}{\sum_{i=1}^n N_i}, \text{ where:}$$

- $i$  = Surveillance test number,
- $n$  = Number of surveillance tests performed to date in the cycle (including BOC),
- $N_i$  = Number of rods tested in the  $i^{th}$  surveillance test, and
- $\tau_i$  = Average scram time to notch 36 for surveillance test  $i$

$$\tau_B = \mu + 1.65 \left( \frac{N_1}{\sum_{i=1}^n N_i} \right)^{1/2} (\sigma), \text{ where:}$$

- $i$  = Surveillance test number
- $n$  = Number of surveillance tests performed to date in the cycle (including BOC),
- $N_1$  = Number of rods tested in the  $i^{th}$  surveillance test
- $N_1$  = Number of rods tested at BOC,
- $\mu$  = 0.834 seconds  
(mean value for statistical scram time distribution from de-energization of scram pilot valve solenoid to pickup on notch 36),
- $\sigma$  = 0.059 seconds  
(standard deviation of the above statistical distribution).

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% RATED THERMAL POWER.



## POWER DISTRIBUTION LIMITS

### LIMITING CONDITION FOR OPERATION (Continued)

#### ACTION:

Within twelve hours after determining that  $\tau_{ave}$  greater than  $\tau_B$ , the operating limit MCPRs shall be either:

- a. Adjusted for each fuel type such that the operating limit MCPR is the maximum of the non-pressurization transient MCPR operating limit (from Table 3.2.3.2-1) or the adjusted pressurization transient MCPR operating limits, where the adjustment is made by:

$$MCPR_{adjusted} = MCPR_{option\ B} + \frac{\tau_{ave} - \tau_B}{\tau_A - \tau_B} (MCPR_{option\ A} - MCPR_{option\ B})$$

where:  $\tau_A$  = 1.05 seconds, control rod average scram insertion time limit to notch 36 per Specification 3.1.3.3,  
 $MCPR_{option\ A}$  = Determined from Table 3.2.3.2-1,  
 $MCPR_{option\ B}$  = Determined from Table 3.2.3.2-1, or

- b. The OPTION A MCPR limits listed in Specification 3.2.3.1.

### SURVEILLANCE REQUIREMENTS

4.2.3.2 The values of  $\tau_{ave}$  and  $\tau_B$  shall be determined and compared each time a scram time test is performed. The requirement for the frequency of scram time testing shall be identical to Specification 4.1.3.2.

TABLE 3.2.3.2-1

## TRANSIENT OPERATING LIMIT MCPR VALUES

TRANSIENT	FUEL TYPE					
	8x8		8x8R		P8x8R	
NONPRESSURIZATION TRANSIENTS						
With RPT operable (op.)	1.29		1.21		1.22	
With RPT inoperable (inop.)	1.29		1.25		1.28	
TURBINE TRIP/LOAD REJECT WITHOUT BYPASS						
	MCPR <sub>A</sub>	MCPR <sub>B</sub>	MCPR <sub>A</sub>	MCPR <sub>B</sub>	MCPR <sub>A</sub>	MCPR <sub>B</sub>
RPT (op.)	1.27	1.19	1.27	1.19	1.29	1.21
RPT (inop.) BOC → EOC - 2000	1.25	1.08	1.26	1.08	1.28	1.09
RPT (inop.) EOC - 2000 → EOC	1.37	1.25	1.38	1.26	1.41	1.29
FEEDWATER CONTROL FAILURE						
	MCPR <sub>A</sub>	MCPR <sub>B</sub>	MCPR <sub>A</sub>	MCPR <sub>B</sub>	MCPR <sub>A</sub>	MCPR <sub>B</sub>
RPT (op.)	1.19	1.16	1.19	1.16	1.19	1.16
RPT (inop.) BOC → EOC - 2000	1.18	1.12	1.19	1.13	1.19	1.13
RPT (inop.) EOC - 2000 → EOC	1.18	1.12	1.18	1.12	1.19	1.13

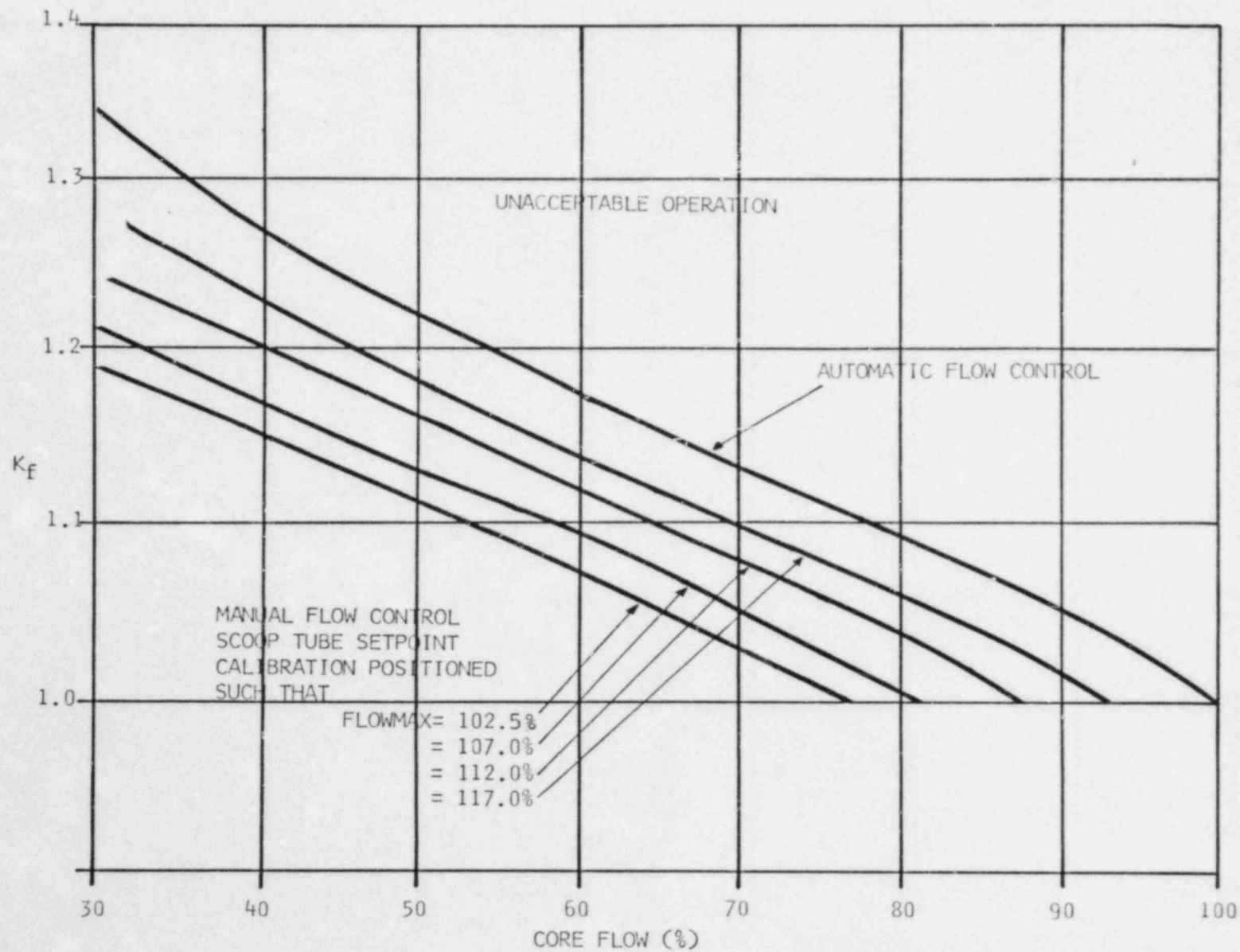
 $K_f$  FACTOR

FIGURE 3.2.3-1

## POWER DISTRIBUTION LIMITS

### 3/4.2.4 LINEAR HEAT GENERATION RATE

#### LIMITING CONDITION FOR OPERATION

---

3.2.4 The LINEAR HEAT GENERATION RATE (LHGR) shall not exceed 13.4 kw/ft for 8 X 8, 8 X 8R, and P8 X 8R fuel assemblies.

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER.

#### ACTION:

With the LHGR of any fuel rod exceeding the above limits, initiate corrective action within 15 minutes and continue corrective action so that the LHGR is within the limit within 4 hours, or reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.2.4 LHGRs shall be determined to be equal to or less than the applicable above limit:

- a. At least once per 24 hours,
- b. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and
- c. Initially and at least once per 12 hours when the reactor is operating on a LIMITING CONTROL ROD PATTERN for LHGR.

### 3/4.2 POWER DISTRIBUTION LIMITS

#### BASES

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The specifications of this section assure that the peak cladding temperature following the postulated design basis loss-of-coolant accident will not exceed the 2200°F limit specified in the Final Acceptance Criteria (FAC) issued in June 1971 considering the postulated effects of fuel pellet densification.

#### 3/4.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE

This specification assures that the peak cladding temperature following the postulated design basis loss-of-coolant accident will not exceed the limit specified in 10 CFR 50, Appendix K.

The peak cladding temperature (PCT) following a postulated loss-of-coolant accident is primarily a function of the average heat generation rate of all the rods of a fuel assembly at any axial location and is dependent only secondarily on the rod-to-rod power distribution within a assembly. The peak cladding temperature is calculated assuming a LHGR for the highest-powered rod which is equal to or less than the design LHGR corrected for densification. This LHGR times 1.02 is used in the heatup code along with the exposure-dependent steady state gap conductance and rod-to-rod local peaking factor. The Technical Specification APHGR is this LHGR of the highest-powered rod divided by its local peaking factor. The limiting value for APLHGR is shown in Figures 3.2.1-1, 3.2.1-2, 3.2.1-3, 3.2.1-4, 3.2.1-5, and 3.2.1-6.

The calculational procedure used to establish the APLHGR shown on Figures 3.2.1-1, 3.2.1-2, 3.2.1-3, 3.2.1-4, 3.2.1-5, and 3.2.1-6 is based on a loss-of-coolant accident analysis. The analysis was performed using General Electric (GE) calculational models which are consistent with the requirements of Appendix K to 10 CFR 50. A complete discussion of each code employed in the analysis is presented in Reference 1. Differences in this analysis compared to previous analyses performed with Reference 1 are (1) The analysis assumes a fuel assembly planar power consistent with 102% of the MAPLHGR shown in Figures 3.2.1-1, 3.2.1-2, 3.2.1-3, 3.2.1-4, 3.2.1-5, and 3.2.1-6; (2) Fission product decay is computed assuming an energy release rate of 200 MeV/Fission; (3) Pool boiling is assumed after nucleate boiling is lost during the flow stagnation period; and (4) The effects of core spray entrainment and countercurrent flow limitation as described in Reference 2, are included in the reflooding calculations.

A list of the significant plant input parameters to the loss-of-coolant accident analysis is presented in Bases Table B 3.2.1-1.

Bases Table B 3.2.1-1  
SIGNIFICANT INPUT PARAMETERS TO THE  
LOSS-OF-COOLANT ACCIDENT ANALYSIS  
FOR BRUNSWICK - UNIT 2

Plant Parameters;

Core Thermal Power	2531 Mwt which corresponds to 105% of rated steam flow
Vessel Steam Output	$10.96 \times 10^6$ Lbm/h which corresponds to 105% of rated steam flow
Vessel Steam Dome Pressure	1055 psia
Recirculation Line Break Area for Large Breaks	
a. Discharge	$2.4 \text{ ft}^2$ (DBA); $1.9 \text{ ft}^2$ (80% DBA)
b. Suction	$4.2 \text{ ft}^2$
Number of Drilled Bundles	520

Fuel Parameters:

FUEL TYPES	FUEL BUNDLE GEOMETRY	PEAK TECHNICAL SPECIFICATION LINEAR HEAT GENERATION RATE (kw/ft)	DESIGN AXIAL PEAKING FACTOR	INITIAL MINIMUM CRITICAL POWER** RATIO
Reload Core	8 x 8	13.4	1.4	1.20

A more detailed list of input to each model and its source is presented in Section II of Reference 1.

\* This power level meets the Appendix K requirement of 102%.

\*\* To account for the 2% uncertainty in bundle power required by Appendix K, the SCAT calculation is performed with an MCPR of 1.18 (i.e., 1.2 divided by 1.02) for a bundle with an initial MCPR of 1.20.



## POWER DISTRIBUTION LIMITS

### BASES

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#### 3/4.2.2 APRM SETPOINTS

The fuel cladding integrity Safety Limits of Specification 2.1 were based on a TOTAL PEAKING FACTOR of 2.43 for 8 x 8 fuel, 2.39 for 8 x 8R fuel and 2.39 for P8 x 8R fuel. The scram setting and rod block functions of the APRM instruments must be adjusted to ensure that the MCPR does not become less than 1.0 in the degraded situation. The scram settings and rod block settings are adjusted in accordance with the formula in this specification when the combination of THERMAL POWER and peak flux indicates a TOTAL PEAKING FACTOR greater than 2.43 for 8 x 8 fuel, 2.39 for 8 x 8R and 2.39 for P8 x 8R fuel. This adjustment may be accomplished by increasing the APRM gain and thus reducing the slope and intercept point of the flow referenced APRM high flux scram curve by the reciprocal of the APRM gain change. The method used to determine the design TPF shall be consistent with the method used to determine the MTPF.

#### 3/4.2.3 MINIMUM CRITICAL POWER RATIO

The required operating limit MCPRs at steady state operating conditions as specified in Specification 3.2.3 are derived from the established fuel cladding integrity Safety Limit MCPR of 1.07, and an analysis of abnormal operational transients.<sup>(1)</sup> For any abnormal operating transient analysis evaluation with the initial condition of the reactor being at the steady state operating limit, it is required that the resulting MCPR does not decrease below the Safety Limit MCPR at any time during the transient, assuming an instrument trip setting as given in Specification 2.2.1.

To assure that the fuel cladding integrity Safety Limit is not exceeded during any anticipated abnormal operational transient, the most limiting transients have been analyzed to determine which result in the largest reduction in CRITICAL POWER RATIO (CPR). The type of transients evaluated were loss of flow, increase in pressure and power, positive reactivity insertion, and coolant temperature decrease.

The limiting transient which determines the required steady state MCPR limit is the turbine trip with failure of the turbine bypass. This transient yields the largest  $\Delta$  MCPR. When added to the Safety Limit MCPR of 1.07 the required minimum operating limit MCPR of Specification 3.2.3 is obtained. Prior to the analysis of abnormal operational transients an initial fuel bundle MCPR was determined. This parameter is based on the bundle flow calculated by a GE multichannel steady state flow distribution model as described in Section 4.4 of NEDO-20360<sup>(4)</sup> and on core parameters shown in Reference 3, response to Items 2 and 9.

## POWER DISTRIBUTION LIMITS

### BASES

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#### MINIMUM CRITICAL POWER RATIO (Continued)

For operation in the automatic flow control mode, the same procedure was employed except the initial power distribution was established such that the MCPR was equal to the operating limit MCPR at rated power and flow.

The  $K_f$  factors shown in Figure 3.2.3-1 are conservative for the General Electric Plant operation with 8 x 8 and 8 x 8R fuel assemblies because the operating limit MCPRs of Specification 3.2.3 are greater than the original 1.20 operating limit MCPR used for the generic derivation of  $K_f$ .

At core thermal power levels less than or equal to 25%, the reactor will be operating at minimum recirculation pump speed and the moderator void content will be very small. For all designated control rod patterns which may be employed at this point, operating plant experience indicated that the resulting MCPR value is in excess of requirements by a considerable margin. With this low void content, any inadvertent core flow increase would only place operation in a more conservative mode relative to MCPR. During initial start-up testing of the plant, a MCPR evaluation will be made at 25% thermal power level with minimum recirculation pump speed. The MCPR margin will thus be demonstrated such that future MCPR evaluation below this power level will be shown to be unnecessary. The daily requirement for calculating MCPR above 25% rated thermal power is sufficient since power distribution shifts are very slow when there have not been significant power or control rod changes. The requirement for calculating MCPR when a limiting control rod pattern is approached ensures that MCPR will be known following a change in power or power shape, regardless of magnitude that could place operation at a thermal limit.

#### 3.2.4 LINEAR HEAT GENERATION RATE

The LHGR specification assures that the linear heat generation rate in any rod is less than the design linear heat generation even if fuel pellet densification is postulated. The power spike penalty specified is based on the analysis presented in Section 3.2.1 of the GE topical report NEDM-10735 Supplement 6, and assumes a linearly increasing variation in axial gaps between core bottom and top, and assures with a 95% confidence that no more than one fuel rod exceeds the design linear heat generation rate due to power spiking.