

TECHNICAL SPECIFICATIONS CHANGE REQUEST 170
DESCRIPTION OF CURRENT LICENSE CONDITION

Technical Specification 15.3.10, "Control Rod and Power Distribution Limits," currently contains Limiting Conditions for Operation and surveillance requirements necessary to ensure core subcriticality following a reactor trip, a limit on potential reactivity insertions from a hypothetical rod cluster control assembly (RCCA) ejection, and an acceptable core power distribution during power operation. The various parts of this section contain Limiting Conditions for Operation in the following areas:

TS 15.3.10.A	Bank Insertion Limits
TS 15.3.10.B	Power Distribution Limits
TS 15.3.10.C	Inoperable Rod Cluster Control Assembly
TS 15.3.10.D	Misaligned or Dropped RCCA
TS 15.3.10.E	RCCA Drop Times

Technical Specification Table 15.4.1-2, "Minimum Frequencies for Equipment and Sampling Tests," contains surveillance requirements to maintain the status of the equipment and systems so as to assure safe operation.

TECHNICAL SPECIFICATIONS CHANGE REQUEST 170
DESCRIPTION OF PROPOSED CHANGES

This Technical Specifications change request proposes to modify Section 15.3.10 and 15.4.1. These changes are being proposed to improve the clarity of Point Beach Nuclear Plant Technical Specifications by providing improved guidance for plant operators. The proposed changes are as follows:

1. In order to provide clearer and more logical organization of the Technical Specifications requirements, we propose to divide Technical Specification Section 15.3.10 as follows:

TS 15.3.10.A	Shutdown Margin
TS 15.3.10.B	Rod Operability and Bank Alignment Limits
TS 15.3.10.C	Rod Position Indication
TS 15.3.10.D	Bank Insertion Limits
TS 15.3.10.E	Power Distribution Limits
TS 15.3.10.F	At-Power Physics Tests Exceptions
TS 15.3.10.G	Low Power Physics Tests Exceptions
TS 15.3.10.H	RCCA Drop Times

2. Revisions to existing specifications TS 15.3.10.A.3 and TS 15.3.10.A.4, concerning shutdown margin requirements, are proposed. The proposed specifications would require operators to initiate boration to restore shutdown margin within fifteen minutes should shutdown margin fall below a required limit. These proposed specifications, renumbered 15.3.10.A.1 and 15.3.10.A.2 respectively, are consistent with LCO 3.1.1 and LCO 3.1.2 of NUREG-1431.
3. In order to simplify the existing requirements concerning shutdown and control rods, we propose to include all the applicable existing requirements in TS 15.3.10.B, "Rod Operability and Bank Alignment Limits." This proposed section would contain all of the specifications regarding the operability and alignment requirements for shutdown and control rods. The specifications currently contained in TS 15.3.10.C, "Inoperable Rod Cluster Control Assembly," and TS 15.3.10.D, "Misaligned or Dropped RCCA," would, for the most part, be replaced by the guidance in LCO 3.1.5 of NUREG-1431. However, we do propose to maintain a portion of TS 15.3.10.D.1, in this proposed revision to the Technical Specifications. This specification allows a 24-step misalignment when bank demand position is greater than or equal to 215 steps or less than or equal to 30 steps. Additionally, a period of up to six hours would be allowed to conduct troubleshooting necessary to make an operability determination. This is consistent with guidance contained in existing Technical Specification 15.3.10.C.2.
4. We propose to rewrite Specification 15.3.10.C to address the rod position indication system and the bank demand indication system. These proposed specifications

incorporate requirements currently contained in TS 15.3.10.D.3.a, along with requirements included in LCO 3.1.8 of NUREG-1431.

5. We propose to supplement the existing requirements for shutdown bank position. In addition to the existing requirement from TS 15.3.10.A.1, including the applicable footnote, proposed specification TS 15.3.10.D.1 will also include the required actions of LCO 3.1.6 of NUREG-1431.
6. We propose to supplement the existing requirements for control bank insertion limits. In addition to the existing requirements from TS 15.3.10.A.2, including the applicable footnote, proposed specification TS 15.3.10.D.2 will also include the required actions of LCO 3.1.7 of NUREG-1431.
7. We propose to delete TS 15.3.10.A.5 concerning critical rod position. The proposed specifications TS 15.3.10.D.1 and TS 15.3.10.D.2 adequately address the condition of Specification 15.3.10.A.5.
8. Existing TS 15.3.10.B.1.b requires that, following a refueling shutdown and prior to exceeding 90 percent of rated power and at effective full power monthly intervals thereafter, power distribution maps using the moveable incore detector system shall be performed. We propose to remove this specification from TS 15.3.10 and relocate it to TS Table 15.4.1-2, "Minimum Frequencies for Equipment and Sampling Tests," Item 33.
9. We propose to relocate TS 15.3.10.B.1.b(1) & (2) into the basis section for TS 15.3.10. These two items simply provide information concerning the measurement of hot channel factors.
10. Existing Technical Specification 15.3.10.B.1.c is being split into proposed Specifications 15.3.10.E.1.b and 15.3.10.E.1.c. TS 15.3.10.E.1.b proposes to revise the actions that must be performed should $F_Q(Z)$ exceed the limit of Specification 15.3.10.E.1.a. These proposed actions provide clearer guidance than the existing specifications and are consistent with the guidance in LCO 3.2.1 of the NUREG-1431.
11. Proposed TS 15.3.10.E.1.c revises the actions of existing Specification 15.3.10.B.1.c that must be performed should F_{AH}^N exceed the limit of Specification 15.3.10.E.1.a. These proposed actions provide clearer guidance than the existing specifications and are consistent with the guidance in LCO 3.2.2 of the NUREG-1431.
12. TS 15.3.10.E.2 proposes to modify the actions of existing Specification 15.3.10.B.2 that must be performed should the

axial flux difference exceed the limits specified in Figure 15.3.10-4. These proposed actions incorporate guidance in LCO 3.2.3 and SR 3.2.3.1 of NUREG-1431 as a supplement to the existing requirements.

13. TS 15.3.10.E.3 proposes to modify the actions of existing Specification 15.3.10.B.3 that must be performed should the indicated quadrant power tilt exceed two percent. These proposed actions incorporate guidance in LCO 3.2.4, SR 3.2.4.1, and SR 3.2.4.2 of the NUREG-1431 as a supplement to the existing requirements.
14. TS 15.3.10.F proposes to add at-power physics tests exceptions to the Technical Specifications. The current Technical Specifications in Section 15.3.10 simply state that certain specifications are not applicable during physics tests. However, they do not describe the conditions that must be satisfied during testing or the required actions that should be performed if these conditions are not met. Additionally, this is an improvement over the existing Technical Specifications because the existing specifications do not provide distinction between low power and at-power physics testing. The proposed specification incorporates guidance that is consistent with LCO 3.1.9 of the NUREG-1431 for rod group alignment limits, bank insertion limits, axial flux difference, and quadrant power tilt.
15. TS 15.3.10.G proposes to add low power physics tests exceptions to the Technical Specifications. The current Technical Specifications in Section 15.3.10 simply state that certain specifications are not applicable during physics tests. However, they do not describe the conditions that must be satisfied during testing or the required actions that should be performed if these conditions are not met. Additionally, this is an improvement over the existing Technical Specifications because the existing specifications do not provide distinction between low power and at-power physics testing. The proposed specification incorporates guidance that is consistent with LCO 3.1.10 of the NUREG-1431 for rod group alignment limits and bank insertion limits. A daily requirement to perform a shutdown margin calculation during low-power physics testing is also proposed for addition to Table 15.4.1-2, Item 34.
16. TS 15.3.10.H, which replaces existing Specification 15.3.10.E proposes to add required actions should RCCA drop times not be achieved. If the reactor is critical, the associated RCCA would be declared inoperable. If the reactor is subcritical, the reactor would be required to be maintained subcritical.
17. Revisions to the bases section are also proposed. The revisions will supplement the existing bases section by incorporating portions of the NUREG-1431 bases, as

applicable, associated with the LCOs and surveillance requirements being proposed for addition or as modified.

TECHNICAL SPECIFICATIONS CHANGE REQUEST 170
SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company, the licensee for Point Beach Nuclear Plant, is applying for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Units 1 and 2, respectively. The amendments propose to revise Technical Specifications Section 15.3.10, "Control Rod and Power Distribution Limits," to improve clarity of this section. Additionally, the guidance contained in the Westinghouse Owner's Group Improved Standard Technical Specifications (ISTS), NUREG-1431, Revision 0 was used to aid in improving the specifications that were not clear.

EVALUATION

Technical Specifications Section 15.3.10, "Control Rod and Power Distribution Limits," ensures core subcriticality following a reactor trip, a limit on potential reactivity insertions from a hypothetical rod cluster control assembly (RCCA) ejection, and an acceptable core power distribution during power operation.

Shutdown Margin

Shutdown margin requirements must be satisfied during all plant conditions. Should these requirements not be satisfied, operator action must be initiated promptly in order to correct the situation. At Point Beach Nuclear Plant, operators would borate, as necessary, to restore the shutdown margin. However, there is currently no time limit specified for this required action. We propose to add an action statement to the Technical Specifications that would require operators to initiate boration within fifteen minutes to restore shutdown margin requirements. The proposed time period is consistent with the time limit in NUREG-1431 and would allow an adequate period of time for an operator to correctly align and operate the systems and components required for boration. This proposal is considered to be more restrictive than existing Technical Specification Section 15.3.10 requirements, because of the inclusion of the 15 minute time limit.

Rod Operability and Bank Alignment Limits

The addition of operability requirements for shutdown and control rods is proposed. The operability of shutdown and control rods is one of the initial assumptions in the safety analyses that assume rod insertion following a reactor trip. When one or more rods are determined to be inoperable (i.e. untrippable), there is a possibility that the required shutdown margin may be adversely affected. It is therefore important to ensure that shutdown margin requirements are satisfied. If the shutdown margin is less than the required limit, boration must be initiated and continued until the shutdown margin is restored. A one-hour time

limit is proposed to accomplish this action. The shutdown margin must take into account the worth of the untrippable rod, as well as a rod of maximum worth. The one-hour time limit is consistent with NUREG-1431, and it is more restrictive than existing Technical Specification requirements.

If shutdown margin cannot be restored, plant personnel would be required to place the plant in a condition where LCO requirements are no longer applicable. Therefore, the plant must be placed in hot shutdown within six hours. This proposed time period allows the operators to shutdown the plant in an orderly manner.

Rod misalignment is an initial assumption in the safety analyses that directly affects core power distributions and assumptions of available shutdown margin. Should a misalignment condition occur, the proposed actions would require that operators restore the misaligned rod to within alignment limits within one hour. However, if the misalignment condition cannot be corrected within this time frame then the shutdown margin is verified within one hour and the thermal power would be reduced to $\leq 75\%$ reactor thermal power within eight hours to ensure that shutdown margin requirements and ejected rod worth requirements are preserved. A period of eight hours is proposed for this power reduction. This time period is consistent with the existing Technical Specification requirement. The time to verify shutdown margin did not previously appear in the PBNP Technical Specifications, the proposed one hour time limit is consistent with NUREG-1431 Standard Technical Specifications requirements.

Continued operation with a misaligned rod would be allowed if $F_Q(Z)$ and $F_{\Delta H}^N$ are verified to be within their limits. When a control rod is misaligned, the assumptions that are used to determine the rod insertion limits, axial flux difference limits, and quadrant power tilt limits are not preserved. Therefore, the limits may not preserve the design peaking factors, requiring that $F_Q(Z)$ and $F_{\Delta H}^N$ be verified directly by incore mapping. These proposed revisions are consistent with the requirements of NUREG-1431 and would impose more restrictive requirements than the existing Technical Specifications.

The provision to subsequently increase power above 75% with the rod misalignment has been retained in the proposed specifications. This provision requires that an analysis to determine the hot channel factors and resulting allowable power level.

Additionally, the existing specifications allow a period of six hours to conduct the troubleshooting as necessary to make an operability determination when an RCCA will not step on demand. This provision has been retained and does not change how Point Beach Nuclear Plant is being operated. If a determination cannot be made within six hours, the applicable rod shall be declared inoperable and the subsequent actions required for an inoperable

rod shall be taken from that point in accordance with the applicable Technical Specifications.

Rod Position Indication

As stated above, the operability of shutdown and control rods is an initial assumption in all safety analyses that take credit for rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the safety analysis that directly affects core power distributions and assumption of available shutdown margin. We propose that requirements be added to the Technical Specifications concerning the operability of the rod position indication system and the bank demand position indication system. These specifications are being proposed because rod position indication is required in order to assess rod operability and misalignment. The proposed specifications for the rod indication systems are consistent with the requirements in NUREG-1431 and would impose additional requirements on the operation of Point Beach.

Bank Insertion Limits

During power operation, the shutdown banks are fully withdrawn from the core and control of reactivity is by the control banks. The associated control rod insertion limits provide for achieving hot shutdown by reactor trip at any time and assume the highest worth control rod remains fully withdrawn. If the shutdown banks are not fully withdrawn, prompt operator action is required. Point Beach's current Technical Specifications do not specify any required actions should such a condition exist. We propose that the operator be required to verify that the shutdown margin is within limits within one hour or initiate boration to restore the shutdown margin within one hour. Additionally, the shutdown banks shall be fully withdrawn within six hours. If these actions cannot be performed, the reactor would be placed in hot shutdown within the following six hours. These proposed actions and their associated completion times are appropriate for the significance of maintaining this safety function and place additional requirements on the operation of Point Beach.

Similarly, we propose to add requirements to the Technical Specifications concerning operator actions should control bank insertion limits be violated. These actions would be identical to the actions required for the shutdown banks except that the operator would be required to restore the control banks to within limits within six hours. These proposed actions and their associated completion times are appropriate for the significance of maintaining this safety function and more restrictive than the existing Technical Specifications requirements.

Power Distribution Limits

The purpose of power distribution limits is to ensure that an acceptable core power distribution is maintained during power

operation. If $F_Q(Z)$, the height dependent heat flux hot channel factor, or F_{AH}^N , the nuclear enthalpy rise hot channel factor, exceed their limits, we propose additional required actions. The proposed additional actions would delineate specific operator actions that must be performed, including power reductions and readjustments of reactor protection system setpoints. These additional actions improve the Technical Specifications by making them more prescriptive and hence clearer. These proposed additional actions are consistent with NUREG-1431.

The limits on axial flux difference ensure that the axial power distribution is maintained in the core. Should the axial flux difference exceed the limits of TS Figure 15.3.10-4, we propose operator actions consistent with those contained in the current Technical Specifications. The proposed specifications, however, are being rewritten to more clearly define the required operator actions.

The quadrant tilt limit ensures that the gross radial power distribution remains consistent with the design values used in the safety analyses. Should quadrant power tilt exceed two percent, with thermal power greater than or equal to fifty percent of rated thermal power, we propose the following prescriptive actions: We propose to reduce thermal power ≥ 2 percent from rated thermal power for each one percent of indicated quadrant power tilt. This proposed action is consistent with what is currently performed at Point Beach. We have also proposed to add several actions to the Technical Specifications that are not currently performed at Point Beach. The addition of these new actions are consistent with guidance contained in NUREG-1431.

This proposed specification differs from the current Technical Specifications in that it is only applicable when thermal power is greater than fifty percent of rated thermal power. This specification is not applicable ≤ 50 percent of rated thermal power because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require the implementation of a quadrant tilt limit on the distribution of core power. The limitations placed on $F_Q(Z)$ and F_{AH}^N will still ensure that core power distributions are maintained within design limits.

The reports required by the existing Technical Specifications for reporting a quadrant power tilt that was not corrected, exceeding the design hot channel factors, or having undetermined hot channel factors within 24 hours, are no longer considered necessary and appropriate reports to the NRC would be made under the requirements of 10 CFR 50.72 and/or 50.73, if required.

The monthly surveillance requirement for hot channel factors has been relocated to TS Table 15.4.1-2. This change is

administrative only and does not alter the surveillance requirement.

Physics Test Exceptions

The primary purpose of at-power and low power physics tests exceptions is to permit relaxations of existing specifications to allow the performance of instrumentation calibration tests and special physics tests. The current Point Beach Technical Specifications do not identify the plant conditions that must be maintained during at-power or low-power physics testing. We propose to add two sections to the TS 15.3.10 to delineate which requirements may be suspended during at-power and low-power physics testing. These specifications will also delineate plant conditions that must be maintained during the performance of the physics testing, as well as actions that must be performed should any of these required plant conditions be violated. These two proposed sections will enhance the Technical Specifications because they will provide guidance to plant operators in an area where none currently exists. Additionally, a daily surveillance on shutdown margin during low power physics testing is being added to TS Table 15.4.1-2. This surveillance will establish appropriate monitoring of shutdown margin during low power physics testing. These proposed specifications are also consistent with the guidance contained in NUREG-1431.

RCCA Drop Times

The drop times for RCCAs shall be no greater than 2.2 seconds from the loss of stationary gripper coil voltage to dashpot entry. TS 15.3.10.H is being revised to identify the actual plant conditions when the actual drop tests are performed. Additionally, the revised specification will include required actions should a drop time exceed 2.2 seconds. These required actions are identical to what is currently being performed at Point Beach.

Technical Specifications Basis

Finally, this change request also proposes to modify the bases for Section 15.3.10 of the Technical Specifications. The modifications to the bases will incorporate information associated with the new proposed additions. These modifications will improve the existing bases and provide background information for the new section. Also, the information being added to the bases is consistent with bases information in NUREG-1431.

Conclusion

These proposed changes provide appropriate limiting conditions for operation, action statements, allowable outage times, and surveillance requirements for the Point Beach Nuclear Plant Technical Specifications for the Control Rod and Power

Distribution Limits. Therefore, safe operation of PBNP continues to be assured by these proposed Technical Specifications changes.

TECHNICAL SPECIFICATION CHANGE REQUEST 170
"NO SIGNIFICANT HAZARDS CONSIDERATION"

In accordance with the requirements of 10 CFR 50.91(a), Wisconsin Electric Power Company (Licensee) has evaluated the proposed changes against the standards of 10 CFR 50.92 and has determined that the operation of Point Beach Nuclear Plant, Units 1 and 2 in accordance with the proposed amendments does not present a significant hazards consideration. The analysis of the requirements of 10 CFR 50.92 and the basis for this conclusion are as follows:

1. Operation of this facility under the proposed Technical Specifications change will not create a significant increase in the probability or consequences of an accident previously evaluated.

The probabilities of accidents previously evaluated are based on the probability of initiating events for these accidents. Initiating events for accidents previously evaluated for Point Beach include: control rod withdrawal and drop, CVCS malfunction (Boron dilution), startup of an inactive reactor coolant loop, reduction in feedwater enthalpy, excessive load increase, losses of reactor coolant flow, loss of external electrical load, loss of normal feedwater, loss of all AC power to the auxiliaries, turbine overspeed, fuel handling accidents, accidental releases of waste liquid or gas, steam generator tube rupture, steam pipe rupture, control rod ejection, and primary coolant system ruptures.

The consequences of the accidents previously evaluated in the PBNP FSAR are determined by the results of analyses that are based on initial conditions of the plant, the type of accident, transient response of the plant, and the operation and failure of equipment and systems.

This change request proposes to improve the clarity of the requirements concerning shutdown margin, rod group alignment limits, rod position indication, bank insertion limits, power distribution limits, at-power physics tests exceptions, and low power physics tests exceptions. The proposed changes do not affect the probability of any accident initiating event, because these Technical Specification requirements do not control any factors that could be accident initiators. These Technical Specifications establish the requirements that provide the limitations on the initial conditions, transient response of the plant, and operation and failure of equipment and systems. The proposed changes establish the appropriate limiting conditions for operation, action statements, and allowable outage times that will continue to ensure that the results of the accident analyses are not changed. Additionally, there is no physical change to the facility or

its systems. Therefore, the probability and consequences of any accident previously evaluated is not increased.

2. Operation of this facility under the proposed Technical Specifications change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

New or different kinds of accidents can only be created by new or different accident initiators or sequences. This change request proposes to improve the clarity of the Technical Specifications requirements contained in Technical Specification Section 15.3.10. The proposed specifications will clarify the existing Technical Specifications where identified by re-wording, supplementing, or replacing existing requirements. There is no physical change to the facility or its systems. Therefore, a new or different kind of accident cannot occur, because no factors have been introduced that could create a new or different accident initiator.

3. Operation of this facility under the proposed Technical Specifications change will not create a significant reduction in a margin of safety.

The margins of safety for Point Beach are based on the design and operation of the reactor and containment and the safety systems that provide their protection.

This change request proposes to improve the clarity of the Technical Specifications requirements contained in Technical Specification Section 15.3.10. The proposed specifications will clarify the existing Technical Specifications where identified by re-wording, supplementing, or replacing existing requirements. There is no physical change to the facility or its systems. Section 15.3.10 of the Technical Specifications provides the requirements that limit the operation of the reactor and establish the operability requirements for reactivity control by the control rod system. The proposed Technical Specifications changes continue to provide the appropriate limiting conditions for operation, action statements, and allowable outage times that ensure the applicable margins of safety to protect the reactor are preserved. Therefore, no reduction in any margin of safety has been introduced.

15.3.10 CONTROL ROD AND POWER DISTRIBUTION LIMITS

Applicability

Applies to the operation of the control rods and to core power distribution limits.

Objective

To insure (1) core subcriticality after a reactor trip, (2) a limit on potential reactivity insertions from a hypothetical rod cluster control assembly (RCCA) ejection, and (3) an acceptable core power distribution during power operation.

Specification

A. Bank Insertion Limits SHUTDOWN MARGIN

31. The shutdown margin shall exceed the applicable value as shown in Figure 15.3.10-2 under all steady-state operating conditions from 350°F to full power. ~~An exception to the stuck RCCA component of the shutdown margin requirement is permitted for physics tests.~~ If the shutdown margin is less than the applicable value of Figure 15.3.10-2, within 15 minutes initiate boration to restore the shutdown margin.
42. ~~Except for physics tests a~~ A shutdown margin of at least 1% $\Delta k/k$ shall be maintained when the reactor coolant temperature is less than 350°F. If the shutdown margin is less than this limit, within 15 minutes initiate boration to restore the shutdown margin.
5. ~~During any approach to criticality, except for physics tests, the critical rod position shall not be lower than the insertion limit for zero power. That is, if the control rods were withdrawn in normal sequence with no other reactivity change, the reactor would not be critical until the control banks were above the insertion limit.~~

B. Power Distribution Limits ROD OPERABILITY AND BANK ALIGNMENT LIMITS

1. During power and low power operation, all shutdown and control rods shall be operable, with all individual indicated rod positions within twelve steps of their bank demand position, except when the bank demand position is ≤ 30 steps or ≥ 215 steps. In this case, all individual indicated rod positions shall be within 24 steps of their bank demand position.

If an RCCA does not step in upon demand, up to six hours is allowed to determine whether the problem with stepping is an electrical problem. If the problem cannot be resolved within six hours, the RCCA shall be ~~assumed~~ declared inoperable until it has been verified that it will step in or would drop upon demand.

a. Rod Operability Requirements

- (1) If one rod is determined to be untrippable, perform the following actions:

- (a) Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2;
OR
 - (b) Within one hour restore the shutdown margin by boration;
OR
 - (c) Within six hours be in hot shutdown.
- (2) If sustained power operation with an untrippable rod is desired, perform the following actions:
- (a) Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2; OR within one hour restore the shutdown margin by boration;
AND
 - (b) Within six hours, adjust the insertion limits to reflect the worth of the untrippable rod.
 - (c) If the above actions and associated completion times are not met, be in hot shutdown within six hours.
- (3) If more than one rod is determined to be untrippable, perform the following actions:
- (a) Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2; OR within one hour restore the shutdown margin by boration;
AND
 - (b) Within six hours be in hot shutdown.

b. Rod Bank Alignment Limits

- (1) If it has been determined that one rod is not within alignment limits, and the indicated misalignment is not being caused by malfunctioning rod position indication, within one hour restore the rod to within alignment limits; OR perform the following actions:
- (a) Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2; OR within one hour restore the shutdown margin by boration;
AND
 - (b) Within eight hours reduce thermal power to ≤ 75 percent of rated thermal power;
AND
 - (c) Verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2 once per twelve hours;
AND

- (d) Within 72 hours verify that measured values of $F_o(Z)$ are within limits;
AND
- (e) Within 72 hours verify that F''_{AH} is within limits;
- (f) If the above actions and associated completion times are not met, be in hot shutdown within the following six hours.
- (g) In order to subsequently increase thermal power above 75 percent of rated thermal power with the existing rod misalignment, perform an analysis to determine the hot channel factors and the resulting allowable power level in accordance with TS 15.3.10.E.

(2) If it has been determined that more than one rod is not within alignment limits and the misalignments are not being caused by malfunctioning rod position indication, perform the following actions:

- (a) Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2; OR within one hour restore the shutdown margin by boration;
AND
- (b) Be in hot shutdown within six hours.

~~6. Inoperable Rod Cluster Control Assembly (RCCA)~~

- ~~1. An RCCA shall be considered inoperable if one or more of the following occurs:~~
 - ~~a. The RCCA does not drop upon removal of stationary gripper coil voltage.~~
 - ~~b. The RCCA does not step in properly when the proper voltage sequences are applied to the control rod drive mechanism coils. It shall then be assumed inoperable until it has been tested to verify that it does drop.~~
 - ~~c. If the bank demand position is greater than or equal to 215 steps, or, less than or equal to 30 steps, and the rod position indicator channel shows a misalignment from the bank demand position of 24 steps, the RCCA shall be assumed inoperable until it has been tested to verify that it does step properly.~~
 - ~~d. If the bank demand position is between 215 steps and 30 steps, and the rod position indicator channel shows a misalignment from the bank demand position of 12 steps, the RCCA shall be assumed inoperable until it has been tested to verify that it does step properly.~~

~~2. Specification 15.3.10.C.1.b can be modified by the following:~~

- b. ~~If more than one RCCA does not step in, apparently due to electrical problems, the situation shall be rectified or clearly defined that it is an electrical problem and the RCCAs are capable of dropping upon demand or an orderly shutdown shall commence within six hours.~~
3. ~~No more than one inoperable RCCA shall be permitted during sustained power operation.~~
4. ~~When it has been determined that an RCCA does not drop on removal of stationary gripper coil voltage, the shutdown margin shall be maintained by boration as necessary to compensate for the withdrawn worth of the inoperable RCCA. If sustained power operation is anticipated, the insertion limit shall be adjusted to reflect the worth of the inoperable RCCA.~~

C. ROD POSITION INDICATION

NOTE: Separate entry into TS 15.3.10.C.1.a, b, or c is allowed for each inoperable rod position indicator and each bank of demand position indication.

1. During power operation ≥ 10 percent of rated thermal power, the rod position indication system and the bank demand position indication system shall be operable.
- a. If one or more rod position indicators (RPI) are determined to be inoperable, perform the following actions:
- (1) Within eight hours verify the position of the rods with inoperable RPIs by using movable incore detectors;
AND
 - (2) Once per shift check the position of the rods with inoperable RPIs by using excore detectors, or thermocouples, or movable incore detectors;
 - (3) If the above actions and associated completion times are not met, perform the actions in accordance with TS 15.3.10.B.1.b.
- b. If one or more rods with inoperable RPIs have been moved in excess of 24 steps in one direction since the last determination of the rod's position, perform the following actions:
- (1) Within four hours check the position of the rods with inoperable RPIs by using excore detectors, or thermocouples, or movable incore detectors;
 - (2) If the above action and associated completion time is not met, perform the actions in accordance with TS 15.3.10.B.1.b.
- c. If bank demand position indication, for one or more banks, is determined to be inoperable, perform the following actions:

- (1) Once per shift verify that all RPis for the affected banks are operable;
AND
- (2) Once per shift verify that the most withdrawn rod and the least withdrawn rod of the affected banks are ≤ 12 steps apart, except when the bank demand position is ≤ 30 steps or ≥ 215 steps. In this case, once per shift verify that the most withdrawn rod and the least withdrawn rod of the affected banks are ≤ 24 steps apart;
- (3) If the above actions and associated completion times are not met, perform the actions in accordance with TS 15.3.10.B.1.b.

D. ~~Misaligned or Dropped RCCA~~

1. ~~If the rod position indicator channel is functional and the associated RCCA is more than 12 steps indicated out of alignment with its bank demand position and cannot be aligned when the bank demand position is between 215 steps and 30 steps, then unless the hot channel factors are shown to be within design limits as specified in Section 15.3.10.B.1 within eight (8) hours, power shall be reduced to less than 75% of Rated Power. When the bank demand position is greater than or equal to 215 steps, or, less than or equal to 30 steps, the allowable indicated misalignment is 24 steps between the rod position indicator and the bank demand position.~~
2. ~~To increase power above 75% with an RCCA more than 12 steps indicated out of alignment with its bank demand position when the bank demand position is between 215 steps and 30 steps, an analysis shall first be made to determine the hot channel factors and the resulting allowable power level based on Section 15.3.10.B. When the bank demand position is greater than or equal to 215 steps, or, less than or equal to 30 steps, the allowable indicated misalignment is 24 steps between the rod position indicator and the bank demand position.~~
3. ~~If it is determined that the apparent misalignment or dropped RCCA indication was caused by rod position indicator channel failure, sustained power operation may be continued if the following conditions are met:~~
 - a. ~~For operation between 10% power and Rated Power, the position of the RCCA(s) with the failed rod position indicator channel(s) will be checked indirectly by core instrumentation (excore detectors, and/or thermocouples, and/or moveable incore detectors) every shift and after associated bank motion exceeding 24 steps in one direction.~~
 - b. ~~For operation below 10% of Rated Power, no special monitoring is required.~~

AD. BANK INSERTION LIMITS

1. When the reactor is critical, except for physics tests and control rod exercises, the shutdown banks shall be fully withdrawn.* Fully

withdrawn is defined as a bank position equal to or greater than 225 steps. This definition is applicable to shutdown and control banks.

If this condition is not met, perform the following actions:

- a. Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2; OR within one hour restore the shutdown margin by boration;
AND
 - b. Within six hours fully withdraw the shutdown banks.
 - c. If the above actions and associated completion times are not met, be in hot shutdown within the following six hours.
2. When the reactor is critical, the control banks shall be inserted no further than the limits shown by the lines on Figure 15.3.10-1. ~~Exceptions to the insertion limit are permitted for physics tests and control rod exercises.~~ If this condition is not met, perform the following actions:
- a. Within one hour verify that the shutdown margin exceeds the applicable value as shown in Figure 15.3.10-2; OR within one hour restore the shutdown margin by boration;
AND
 - b. Within six hours restore the control banks to within limits.
 - c. If the above actions and associated completion times are not met, be in hot shutdown within the following six hours.

BE. POWER DISTRIBUTION LIMITS

1. Hot Channel Factors

- a. ~~Except during low power physics tests, the~~ hot channel factors defined in the basis ~~must~~ shall meet the following limits:

$$F_0(Z) \leq \frac{(2.50)}{P} \times K(Z) \quad \text{for } P > 0.5$$

$$F_0(Z) \leq 5.00 \times K(Z) \quad \text{for } P \leq 0.5$$

$$F_{\text{sh}}^N < 1.70 \times [1 + 0.3 (1 - P)]$$

Where P is the fraction of full power at which the core is operating, K(Z) is the function in Figure 15.3.10-3 and Z is the core height location of F_0 .

- b. ~~Following a refueling shutdown prior to exceeding 90 percent of rated power and at effective full power monthly intervals there after, power distribution maps using the moveable incore detector~~

system shall be made to confirm that the hot channel factor limits are satisfied. The measured hot channel factors shall be increased in the following way:-

- (1) The measurement of total peaking factor, F_{q}^{MEAS} , shall be increased by three percent to account for manufacturing tolerances and further increased by five percent to account for measurement error.
- (2) The measurement of enthalpy rise hot channel factor, $F_{\Delta H}^N$, shall be increased by four percent to account for measurement error.

e. If a measured hot channel factor exceeds the full power limit of Specification 15.3.10.B.1.a, the reactor power and power range high setpoints shall be reduced until those limits are met. If subsequent flux mapping cannot, within 24 hours, demonstrate that the full power hot channel factor limits are met, the overpower and overtemperature ΔT trip setpoints shall be similarly reduced and reactor power limited such that Specification 15.3.10.B.1.a above is met.

b. If $F_o(Z)$ exceeds the limit of Specification 15.3.10.E.1.a, within fifteen minutes reduce thermal power until $F_o(Z)$ limits are satisfied;

(1) After thermal power has been reduced in accordance with Specification 15.3.10.E.1.b, perform the following actions:

(a) Within eight hours reduce the full power Power Range Neutron Flux - High trip setpoints by an amount equivalent to the power reduction required in Specification 15.3.10.E.1.b;

AND

(b) Within 72 hours reduce Overpower and Overtemperature ΔT trip setpoints by an amount equivalent to the power reduction required in Specification 15.3.10.E.1.b;

AND

(c) Verify that $F_o(Z)$ will be within limits for the increased power level prior to increasing any setpoints that have been reduced and thermal power above the limit specified in Specification 15.3.10.E.1.b.

(d) If the above actions and associated completion times are not met, be in low power operation within the following six hours.

c. If $F_{\Delta H}^N$ exceeds the limit of Specification 15.3.10.E.1.a, within four hours reduce thermal power to restore $F_{\Delta H}^N$ to within limits OR perform the following actions:

(1) Within four hours reduce thermal power to ≤ 50 percent rated thermal power;

AND

- (2) Within eight hours reduce the full power Power Range Neutron Flux - High trip setpoints to ≤ 58 percent rated thermal power.

In addition to the above actions, the following actions shall also be performed during the subsequent power escalation if F_{AH}^N had exceeded the limit of Specification 15.3.10.E.1.a:

- (3) Verify that F_{AH}^N is within limits within 24 hours;
AND
- (4) Verify that F_{AH}^N is within limits prior to thermal power exceeding 50 percent of rated thermal power;
AND
- (5) Verify that F_{AH}^N is within limits prior to thermal power exceeding 75 percent of rated thermal power;
AND
- (6) Verify that F_{AH}^N is within limits within 24 hours after reaching ≥ 95 percent of rated thermal power.
- (7) If the above actions and associated completion times are not met, be in hot shutdown within the following six hours.

2. Axial Flux Difference

- a. ~~The indicated axial flux difference (AFD) shall be maintained within the allowed operational space defined by Figure 15.3.10 4 except during physics tests. The physics test exemption applies provided that the thermal power is less than or equal to 85% of Rated Power and the limits of Specification 15.3.10.B.1.a are satisfied. During suspension of the specification, the thermal power shall be determined to be less than or equal to 85% of rated thermal power at least once per hour. In addition, the surveillance requirements of 15.3.10.B.1.b shall be performed at least once per 12 hours.~~
- b. ~~If the indicated AFD deviates from the Figure 15.3.10 4 limits, the AFD shall be restored to within the Figure 15.3.10 4 limits within 15 minutes. If this cannot be accomplished, then reactor power shall be reduced until the AFD is within the envelope or the power level is less than 50 percent of Rated Power. Normally the rate of power reduction is 15% per hour. Once AFD has been returned to and maintained within the operating envelope, power level is no longer restricted. If it is necessary to reduce power to 50%, the Power Range Neutron Flux High Trip Setpoints shall be reduced to less than or equal to 55 percent within the next 4 hours.~~
- c. ~~A power increase to a level greater than 50 percent of Rated Power is contingent upon the indicated AFD being within the Figure 15.3.10 4 limits.~~
- d. ~~Alarms shall normally be used to indicate non-conformance with the flux difference requirements of 15.3.10.B.2.a and 15.3.10.B.2.b. If the alarms are totally out of service, the AFD shall be noted~~

~~and conformance with the limits assessed every hour for the first 24 hours, and half hourly thereafter.~~

- e. ~~The indicated AFD shall be considered outside of its limits when at least 2 operable excore channels are indicating the AFD to be outside the limits.~~

NOTE: The axial flux difference shall be considered outside limits when two or more operable excore channels indicate that axial flux difference is outside limits.

- a. During power operation with thermal power ≥ 50 percent of rated thermal power, the axial flux difference shall be maintained within the limits specified in Figure 15.3.10-4.

(1) If the axial flux difference is not within limits, within 15 minutes restore to within limits. If this action and associated completion time is not met, perform the following actions:

(a) Reduce thermal power until the axial flux difference is within limits;

OR

(b) Within three hours reduce thermal power to ≤ 50 percent of rated thermal power.

- b. If it is necessary to restrict thermal power to ≤ 50 percent of rated thermal power, within the next four hours reduce the Power Range Neutron Flux - High Trip setpoints to ≤ 55 percent.

- c. If the alarms used to monitor the axial flux difference are rendered inoperable, verify that the axial flux difference is within limits for each operable excore channel once within one hour and every hour thereafter.

3. Quadrant Power Tilt

~~Except for physics test, whenever the indicated quadrant power tilt exceeds 2% the tilt condition shall be eliminated within two hours or the following actions shall be taken:~~

- a. ~~Reduce core power level and the power range high flux setpoint two percent of rated values for every percent of indicated quadrant power tilt.~~

- b. ~~If the tilt is not corrected within 24 hours, but the hot channel factors for rated power are not exceeded, an evaluation as to the cause of the discrepancy shall be made and reported to the Nuclear Regulatory Commission. Return to full power is permitted, providing the hot channel factors are not exceeded.~~

- c. ~~If the design hot channel factors for rated power are exceeded or not determined within 24 hours, the Nuclear Regulatory Commission shall be notified and the overpower ΔT and overtemperature ΔT trip~~

~~setpoints shall be reduced by the equivalent of 2% power for every percent of quadrant power tilt.~~

d. ~~The excore nuclear instrumentation system serves as the primary quadrant power tilt alarm. If the alarm is not functional for two hours, backup methods of assuring that the quadrant power tilt is acceptable shall be used. These methods include hand calculations, incore thermocouples using either a computer or manual calculations or incore detectors.~~

a. During power operation with thermal power greater than 50 percent of rated thermal power, the indicated quadrant power tilt shall not exceed 2 percent. If this condition is not met, perform the following actions:

(1) Within two hours, reduce thermal power ≥ 2 percent from rated thermal power for each 1 percent of indicated quadrant power tilt;

AND

(2) Within 24 hours and once per seven days thereafter, verify that $F_o(Z)$ and F_{sh}^N are within the limits of Specification 15.3.10.E.1.a;

AND

(3) Upon completion of Specification 15.3.10.E.3.a(2), calibrate the excore detectors. This action shall be completed prior to increasing thermal power above the limit imposed by Specification 15.3.10.E.3.a(1);

AND

(4) Verify that $F_o(Z)$ and F_{sh}^N are within the limits of Specification 15.3.10.E.1.a within 24 hours after reaching rated thermal power, or within 48 hours after increasing thermal power above the limit imposed by Specification 15.3.10.E.3.a(1).

(5) If the above actions and associated completion times are not met, within the following four hours reduce thermal power to ≤ 50 percent of rated thermal power.

b. If no quadrant power tilt alarms are available, within twelve hours and every twelve hours thereafter, verify that quadrant power tilt is within limits by performing calculations.

ec. When one power range channel is inoperable and thermal power is greater than 75% of rated thermal power, ~~the quadrant power tilt shall be confirmed as acceptable within twelve hours and every twelve hours thereafter, verify that quadrant power tilt is within limits by use of the movable incore detectors at least once per 12 hours.~~

F. AT-POWER PHYSICS TESTS EXCEPTIONS

1. During the performance of at-power physics tests, the requirements of:

Specification 15.3.10.B, "Rod Operability and Bank Alignment Limits"

Specification 15.3.10.D, "Bank Insertion Limits"
Specification 15.3.10.E.2, "Axial Flux Difference"
Specification 15.3.10.E.3, "Quadrant Power Tilt"

are suspended, provided:

- a. Thermal power is maintained ≤ 85 percent of rated thermal power;
AND
 - b. Power Range Neutron Flux - High Trip setpoints are set at a maximum setting of 90 percent of rated thermal power;
2. Within 8 hours prior to the initiation of physics tests, verify that Power Range Neutron Flux - High Trip setpoints are ≤ 90 percent of rated thermal power.
 3. If the shutdown margin is not within the limits of Specification 15.3.10.A.1, within 15 minutes initiate boration to restore the shutdown margin, AND within one hour suspend physics tests exceptions.
 4. If thermal power exceeds 85 percent of rated thermal power, within one hour reduce thermal power to ≤ 85 percent of rated thermal power, OR within one hour suspend physics tests exceptions.
 5. If the Power Range Neutron Flux - High Trip setpoints are greater than 90 percent of rated thermal power, within one hour restore the Power Range Neutron Flux - High Trip setpoints to ≤ 90 percent of rated thermal power, OR within one hour suspend physics tests exceptions.
 6. Every hour, while at-power physics tests are in progress, verify that thermal power is ≤ 85 percent of rated thermal power.

G. LOW POWER PHYSICS TESTS EXCEPTIONS

1. During the performance of low power physics tests, the requirements of:
Specification 15.3.10.B, "Rod Operability and Bank Alignment Limits"
Specification 15.3.10.D, "Bank Insertion Limits"
Specification 15.3.10.E, "Power Distribution Limits"
are suspended, provided the lowest RCS loop average temperature is greater than the minimum temperature for criticality.
2. If the shutdown margin is not within the limits of Specification 15.3.10.A, within 15 minutes initiate boration to restore the shutdown margin, AND within one hour suspend physics tests exceptions.
3. If power is not within limits, open the reactor trip breakers immediately.
4. If lowest RCS loop average temperature is less than the minimum temperature for criticality, within 15 minutes restore lowest RCS loop average temperature to within limits, OR within 30 minutes be subcritical.

EH. RCCA DROP TIMES

1. ~~At operating temperature and full flow, With RCS temperature greater than the minimum temperature for criticality and with both reactor coolant pumps running, the drop time of each RCCA shall be no greater than 2.2 seconds from the loss of stationary gripper coil voltage to dashpot entry. If this condition is not met, perform the following actions:~~
 - a. ~~If the reactor is critical, declare the rod untrippable;~~
 - ~~OR~~
 - b. ~~If the reactor is subcritical, maintain the reactor subcritical.~~

Basis

Insertion Limits and Shutdown Margin

~~The reactivity control concept is that reactivity changes accompanying changes in reactor power are compensated by control rod motion. Reactivity changes associated with xenon, samarium, fuel depletion and large changes in reactor coolant temperature (operating temperature to cold shutdown) are compensated by changes in the soluble boron concentration.~~

During power operation, the shutdown banks are fully withdrawn. Fully withdrawn is defined as a bank demand position equal to or greater than 225 steps. Evaluation has shown that positioning control rods at 225 steps, or greater, has a negligible effect on core power distributions and peaking factors. Due to the low reactivity worth in this region of the core and the fact that, at 225 steps, control rods are only inserted one step into the active fuel region of the core, positioning rods at this position or higher has minimal effect. This position is varied, based on a predetermined schedule, in order to minimize wear of the guide cards in the guide tubes of the RCCA's. RCCA's from the guide cards.

The control rod insertion limits provide for achieving hot shutdown by reactor trip at any time and assume the highest worth control rod remains fully withdrawn. A 10% margin in reactivity worth of the control rods is included to assure meeting the assumptions used in the accident analysis. ~~So a~~ A reactor trip occurring during power operation ~~will put~~ places the reactor into the hot shutdown condition. In addition, the insertion limits provide a limit on the maximum inserted rod worth in the unlikely event of a hypothetical rod ejection and provide for acceptable nuclear peaking factors. The specified control rod insertion limits take into account the effects of fuel densification. The rods are withdrawn in the sequence of A, B, C, D with overlap between banks. The overlap between successive control banks is provided to compensate for the low differential rod worth near the top and bottom of the core.

When the insertion limits are observed and the control rod banks are above the solid lines shown on Figure 15.3.10-1, the shutdown requirement is met. The maximum shutdown margin requirement occurs at end of core life and is based on the value used in analysis of the hypothetical steam break accident. Figure 15.3.10-2 shows the shutdown margin equivalent to 2.77% reactivity at end-of-life with respect to an uncontrolled cooldown. All other accident analyses assume 1% or greater reactivity shutdown margin. Shutdown margin calculations include the effects of axial power distribution. ~~One may~~ The accident analyses assume no

change in core poisoning due to xenon, samarium or soluble boron.

If the shutdown margin requirements are not met, boration must be initiated promptly. Fifteen minutes is an adequate period of time for an operator to correctly align and start the required systems and components. It is assumed that boration will be continued until shutdown margin requirements are met.

Rod Operability Requirements and Bank Alignment Limits

The operability (e.g. trippability) of the shutdown and control rods is an initial assumption in all safety analyses that take credit for rod insertion upon reactor trip. Maximum rod misalignment is also an initial assumption in the safety analyses that directly affect core power distributions and assumptions of available shutdown margin. A rod cluster control assembly (RCCA) shall be considered operable if the RCCA drops upon removal of stationary gripper coil voltage.

Mechanical or electrical failures may cause a control rod to become inoperable or to become misaligned from its group. Control rod inoperability or misalignment may cause increased power peaking due to the asymmetric reactivity distribution. This will also cause a reduction in the total available rod worth for reactor shutdown. Therefore, control rod alignment and operability are related to core operation in design power peaking limits and the core design requirement of a minimum shutdown margin.

~~An inoperable rod imposes additional demands on the operators. The permissible number of inoperable control rods is limited to one in order to limit the magnitude of the operating burden. From operating experience to date, an RCCA which steps in properly will drop when a trip signal occurs because the only force acting to drive the rod in is gravity. When it has been determined that a rod does not drop, extra shutdown margin is gained by boration or by adjusting the insertion limit to account for the worth of the inoperable control rod the shutdown margin calculation will need to include the worth of the inoperable control rod. Further experience indicates that control rods which do not step are usually affected by electrical problems. That is, normally the problem is in the rod control cabinets. If operability cannot be restored, the RCCA will be declared inoperable and corrective actions can be taken to compensate for the associated reduction in shutdown margin. If there is more than one RCCA affected, an orderly shutdown would be started. Such an evolution would have to be performed in a deliberate manner without undue pressure on the operating personnel because of the unusual techniques to be used to accommodate the reactivity changes associated with the shutdown.~~

Rod cluster control assemblies (RCCAs), or rods, are moved by their control rod drive mechanisms (CRDMs). Each CRDM moves its RCCA one step (approximately 5/8 inch) at a time, but at varying rates (steps per minute) depending on the signal output from the Rod Control System.

The RCCAs are divided among control banks and shutdown banks. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs consists of one or two groups that are moved in staggered fashion, but always within one step of each other. Each unit has four control banks and two shutdown banks.

When one or more rods are determined to be untrippable, there is a possibility that the required shutdown margin may be adversely affected. Under these conditions, it is important to determine the shutdown margin, and if it is less than the required value, initiate boration until the required shutdown margin is restored. The one-hour time limit is adequate for determining the shutdown margin and, if necessary, for restoring the shutdown margin by boration. In this situation, shutdown margin verification must include the worth of the untrippable rod, as well as a rod of maximum worth.

If the untrippable rods cannot be restored to an operable condition, the plant must be placed in a condition where the LCO requirements are not applicable. To achieve this status, the unit must be placed in hot shutdown within six hours. This allows this plant condition to be reached in an orderly manner, without challenging any plant systems.

Limits on control rod alignment have been established and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and shutdown margin limits are preserved.

If the misalignment condition cannot be readily corrected, thermal power will be adjusted so that hot channel factors are maintained, and so that the requirements on shutdown margin and ejected rod worth are preserved. Continued operation of the reactor with a misaligned control rod is allowed if $F_0(Z)$ and $F_{\Delta H}^N$ are verified to be within their limits. When a control rod is misaligned, the assumptions that are used to determine the rod insertion limits, axial flux difference limits, and quadrant power tilt limits are not preserved. Therefore, the limits may not preserve the design peaking factors and $F_0(Z)$ and $F_{\Delta H}^N$ must be verified directly by incore mapping.

Upon detection of a potential problem concerning one or more rods, a maximum of six hours is provided for troubleshooting activities. Immediately upon determining that one or more rods is inoperable, the applicable actions in TS 15.3.10.B shall be performed. If after six hours, an operability determination has not yet been made, the rod(s) shall be declared inoperable and the applicable actions in TS 15.3.10.B shall be performed.

Misaligned RCCAS Rod Position Indication

During power operation at greater than ten percent of rated thermal power, the rod position indication system and the bank demand position indication system are required to be operable. These systems are required to be operable because the position of rods must be determined in order to ensure that rod alignment and insertion limits are being satisfied. Rod position accuracy is essential during power operations. Power peaking, ejected rod worth, or shutdown margin limits may be violated in the event of a design basis accident with rods operating, undetected, outside of their required limits.

The various control rod banks (shutdown banks and control banks, A, B, C, and D) are each to be moved as a bank; that is, with all rods in the bank within one step (5/8 inch) of the bank position. Direct information on rod position indication is provided by two methods: A digital count of actuating pulses which shows the demand position of the banks and a linear position indicator (LVDT) which indicates the actual rod position. The rod position indicator channel has

a demonstrated accuracy of 5% of span (± 11.5 steps). Therefore, an analysis has been performed to show that a misalignment of 24 steps cannot cause design hot channel factors to be exceeded. A single fully misaligned RCCA, that is, an RCCA 230 steps out of alignment with its bank, does not result in exceeding core limits in steady-state operation at power levels less than or equal to rated power. In other words, a single dropped RCCA is allowable from a core power distribution viewpoint. If the misalignment condition cannot be readily corrected, the specified reduction in power to 75% will insure that design margins to core limits will be maintained under both steady-state and anticipated transient conditions. The eight (8) hour permissible limit on rod misalignment at rated power is short with respect to the probability of an independent accident.

Because the rod position indicator system may have a 12 step error when a misalignment of 24 steps is occurring, the Specification allows only an indicated misalignment of 12 steps. However, when the bank demand position is greater than or equal to 215 steps, or, less than or equal to 30 steps, the consequences of a misalignment are much less severe. The differential worth of an individual RCCA is less, and the resultant perturbation on power distributions is less than when the bank is in its high differential worth region. At the top and bottom of the core, an indicated 24 step misalignment may be representing an actual misalignment of 36 steps.

The failure of an LVDT in itself does not reduce the shutdown capability of the rods, but it does reduce the operator's capability for determining the position of that rod by direct means. The operator has available to him the excore detector recordings, incore thermocouple readings and periodic incore flux traces for indirectly determining rod position and flux tilts should the rod with the inoperable LVDT become malpositioned. The excore and incore instrumentation will not necessarily recognize a misalignment of 24 steps because the concomitant increase in power density will normally be less than 1% for a 24 step misalignment. The excore and incore instrumentation will, however, detect any rod misalignment which is sufficient to cause a significant increase in hot channel factors and/or any significant loss in shutdown capability. The increased surveillance of the core if one or more rod position indicator channels is out-of-service serves to guard against any significant loss in shutdown margin or margin to core thermal limits.

The history of malpositioned RCCA's indicates that in nearly all such cases, the malpositioning occurred during bank movement. Checking rod position after bank motion exceeds 24 steps will verify that the RCCA with the inoperable LVDT is moving properly with its bank and the bank step counter. Malpositioning of an RCCA in a stationary bank is very rare, and if it does occur, it is usually gross slippage which will be seen by external detectors. Should it go undetected, the time between the rod position checks performed every shift is short with respect to the probability of occurrence of another independent undetected situation which would further reduce the shutdown capability of the rods.

Any combination of misaligned rods below 10% rated power will not exceed the design limits. For this reason, it is not necessary to check the position of rods with inoperable LVDT's below 10% power; plus, the incore instrumentation is not effective for determining rod position until the power level is above approximately 5%.

Power Distribution

During power operation, the global power distribution is limited by TS 15.3.10.E.2, "Axial Flux Difference," and TS 15.3.10.E.3, "Quadrant Power Tilt," which are directly and continuously measured process variables. These specifications, along with TS 15.3.10.D, "Bank Insertion Limits," maintain the core limits on power distributions on a continuous basis.

The purpose of the limits on the values of $F_o(Z)$, the height dependent heat flux hot channel factor, is to limit the local peak power density. The value of $F_o(Z)$ varies along the axial height (Z) of the core.

$F_o(Z)$ is defined as the maximum local fuel rod linear power density divided by the average fuel rod linear power density, assuming nominal fuel pellet and fuel rod dimensions. Therefore, $F_o(Z)$ is a measure of the peak fuel pellet power within the reactor core.

$F_o(Z)$ varies with fuel loading patterns, control bank insertion, fuel burnup, and changes in axial power distribution. $F_o(Z)$ is measured periodically using the incore detector system. These measurements are generally taken with the core at or near steady state conditions.

The purpose of the limits on F_{ah}^N , the nuclear enthalpy rise hot channel factor, is to ensure that the fuel design criteria are not exceeded and the accident analysis assumptions remain valid. The design limits on local and integrated fuel rod peak power density are expressed in terms of hot channel factors. Control of the core power distribution with respect to these factors ensures that local conditions in the fuel rods and coolant channels do not challenge core integrity at any location during either normal operation or a postulated accident analyzed in the safety analyses.

F_{ah}^N , Nuclear Enthalpy Rise Hot Channel Factor, is defined as the ratio of the integral of linear power along a fuel rod to the average fuel rod power. Imposed limits pertain to the maximum F_{ah}^N in the core, that is the fuel rod with the highest integrated power. It should be noted that F_{ah}^N is based on an integral and is used as such in the DNB calculations. Local heat flux is obtained by using hot channel and adjacent channel explicit power shapes which take into account variations in horizontal (x-y) power shapes throughout the core. Thus, the horizontal power shape at the point of maximum heat flux is not necessarily directly related to F_{ah}^N .

F_{ah}^N is sensitive to fuel loading patterns, bank insertion, and fuel burnup. F_{ah}^N typically increases with control bank insertion and typically decreases with fuel burnup.

F_{ah}^N is not directly measurable but is inferred from a power distribution map obtained with the movable incore detector system. Specifically, the results of the three dimensional power distribution map are analyzed by a computer to determine F_{ah}^N . This factor is calculated at least monthly. However, during power operation, the global power distribution is monitored by TS 15.3.10.E.2, "Axial Flux Difference," and TS 15.3.10.E.3, "Quadrant Power Tilt," which address directly and continuously measured process variables.

~~Design criteria have been chosen which are consistent with the fuel integrity~~

analyses. These relate to fission gas release, pellet temperature and cladding mechanical properties. Also the minimum DNBR in the core must not be less than the limit DNBR in normal operation or in short term transients.

In addition to the above, the peak linear power density must not exceed the limiting kw/ft values which result from the large break loss of coolant accident analysis based upon the ECCS acceptance criteria limit of 2200°F. This is required to meet the initial conditions assumed for loss of coolant accident. To aid in specifying the limits on power distribution, the following hot channel factors are defined:

$F_o(Z)$, Height Dependent Heat Flux Hot Channel Factor, is defined as the local heat flux on the surface of a fuel rod at core elevation Z divided by the average fuel rod heat flux, allowing for manufacturing tolerances on fuel pellets and rods. Imposed limits pertain to the maximum $F_o(Z)$ in the core.

F_o^E , Engineering Heat Flux Hot Channel Factor, is defined as the allowance on heat flux required for manufacturing tolerances. The engineering factor allows for local variations in enrichment, pellet density and diameter, surface area of the fuel rod and eccentricity of the gap between pellet and clad. Combined statistically, the net effect is a factor of 1.03 to be applied to fuel rod surface heat flux.

For normal operation, it is not necessary to measure these quantities. Instead it has been determined that, provided the following conditions are observed, the hot channel factor limits will be met:

1. Control rods in a single bank move together with no individual rod insertion differing by more than 24 steps from the bank demand position, when the bank demand position is between 30 steps and 215 steps. A misalignment of 36 steps is allowed when the bank position is less than or equal to 30 steps, or, when the bank position is greater than or equal to 215 steps, due to the small worth and consequential effects of an individual rod misalignment.
2. Control rod banks are sequenced with overlapping banks as described in Figure 15.3.10-1.
3. The full length e Control bank insertion limits are not violated.
4. Axial power distribution control procedures, which are given in terms of flux difference control and control bank insertion limits, are observed. Flux difference refers to the difference in signals between the top and bottom halves of two-section excore neutron detectors. The flux difference is a measure of the axial offset which is defined as the difference in

normalized power between the top and bottom halves of the core.

The permitted relaxation of $F_{\Delta H}^N$ allows radial power shape changes with rod insertion to the insertion limits. It has been determined that provided the above four conditions 1 through 4 are observed, these hot channel factor limits are met. In Specification 15.3.10.BE.1.a, F_Q is arbitrarily limited for $p \leq 0.5$ (except for low power physics tests).

An upper bound envelope of 2.50 times the normalized peaking factor axial dependence of Figure 15.3.10-3 consistent with the Technical Specifications on power distribution control as given in Section 15.3.10 was used in the large and small break LOCA analyses. The envelope was determined based on allowable power density distributions at full power restricted to axial flux difference (ΔI) values consistent with those in Specification 15.3.10.BE.2.

The results of the analyses based on this upper bound envelope indicate a peak clad temperature of less than the 2200°F limit. When an F_Q measurement is taken, both experimental error and manufacturing tolerance must be allowed for taken into account. Five percent is the appropriate allowance for a full core map taken with the moveable incore detector flux mapping system and three percent is the appropriate allowance for manufacturing tolerance. In the design limit of $F_{\Delta H}^N$, there is eight percent allowance for uncertainties which means that normal operation of the core is expected to result in a design $F_{\Delta H}^N \leq 1.70/1.08$. The logic behind the larger uncertainty in this case is that as follows:

- (a) Normal perturbations in the radial power shape (i.e., rod misalignment) affect $F_{\Delta H}^N$, in most cases without necessarily affecting F_Q .
- (b) While the operator has a direct influence on F_Q through movement of rods, and can limit it to the desired value, he has no direct control over $F_{\Delta H}^N$.
- (c) An error in the predictions for radial power shape which may be detected during startup physics tests can be compensated for in F_Q by tighter axial control; but compensation for $F_{\Delta H}^N$ is less readily available.

~~When a measurement of $F_{\Delta H}^N$ is taken, experimental error must be allowed for and four percent is the appropriate allowance for a full core map taken with the moveable incore detector flux mapping system.~~

Measurements of the hot channel factors are required as part of startup physics tests, at least each full power month operation, and whenever abnormal power distribution conditions require a reduction of core power to a level based upon measured hot channel factors. The incore map taken following initial loading provides confirmation of the basic nuclear design bases including proper fuel loading patterns. The periodic monthly incore mapping provides additional assurance that the nuclear design bases remain inviolate and identify operational anomalies which would, otherwise, affect these bases.

The measured hot channel factors are increased as follows:

- (a) The measurement of total peaking factor, F_Q^{max} , shall be increased by three percent to account for manufacturing tolerance and further increased by five percent to account for measurement error.

- (b) The measurement of enthalpy rise hot channel factor, F_{AH}^N shall be increased by four percent to account for measurement error.

Axial Power Distribution

The limits on axial flux difference (AFD) assure that the axial power distribution is maintained such that the $F_0(Z)$ upper bound envelope of F_0^{LIMIT} times the normalized axial peaking factor $[K(Z)]$ is not exceeded during either normal operation or in the event of xenon redistribution following power changes. This ensures that the power distributions assumed in the large and small break LOCA analyses will bound those that occur during plant operation.

Provisions for monitoring the AFD on an automatic basis are derived from the plant process computer through the AFD monitor alarm. The computer determines the AFD for each of the operable excore channels and provides a computer alarm if the AFD for at least 2 of 4 or 2 of 3 operable excore channels are outside the AFD limits and the reactor power is greater than 50 percent of Rated Power.

Quadrant Tilt

The quadrant tilt limit ensures that the gross radial power distribution remains consistent with the design values used in the safety analyses. Precise radial power distribution measurements are made during startup testing, after refueling, and periodically during power operation.

The power density at any point in the core must be limited so that the fuel design criteria are maintained. Together, specifications associated with axial flux difference, quadrant tilt, and control rod insertion limits provide limits on process variables that characterize and control the three dimensional power distribution of the reactor core. Control of these variables ensures that the core operates within the fuel design criteria and that the power distribution remains within the bounds used in the safety analyses.

The excore detectors are somewhat insensitive to disturbances near the core center or on the major axes. It is therefore possible that a five percent tilt might actually be present in the core when the excore detectors respond with a two percent indicated quadrant tilt. On the other hand, they are overly responsive to disturbances near the periphery on the 45° axes.

Tilt restrictions are not applicable during the startup and initial testing of a reload core which may have an inherent tilt. During this time sufficient testing is performed at reduced power to verify that the hot channel factor limits are met and the nuclear channels are properly aligned. The excore detectors are normally aligned indicating no quadrant power tilt because they are used to alarm on a rapidly developing tilt. Tilts which develop slowly are more accurately and readily discerned by incore measurements. The excore detectors serve as the prime indication of a quadrant power tilt. If a channel fails, is out-of-service for testing, or is unreliable, two hours is a short time with respect to the probability of an unsafe quadrant power tilt developing. Two hours gives the operating personnel sufficient time to have the problem investigated and/or put into operation one of several possible alternative methods of determining tilt.

Physics Tests Exceptions

The primary purpose of the at-power and low power physics tests is to permit relaxations of existing specifications to allow performance of instrumentation calibration tests and special physics tests. The at-power specification allows selected control rods and shutdown rods to be positions outside their specified alignment and insertion limits to conduct physics tested at power. The power level is limited to ≤ 85 percent of rated thermal power and the power range neutron flux trip setpoint is set at maximum of 90 percent of rated thermal power. Operation with thermal power ≤ 85 percent of rated thermal power during physics tests provides an acceptable thermal margin when one or more of the applicable specifications is not being met. The Power Range Neutron Flux - High trip setpoint is reduced so that a similar margin exists between the steady-state condition and the trip setpoint that exists during normal operation at rated thermal power.

The low power specification allows selected control and shutdown rods to be positioned outside of their specified alignment and insertion limits to conduct physics tests at low power. If power exceeds two percent, as indicated by nuclear instrumentation, during the performance of low power physics tests, the only acceptable action is to open the reactor trip breakers to prevent operation of the reactor beyond its design limits. Immediately opening the reactor trip breakers will shut down the reactor and prevent operation of the reactor outside of its design limits. If the RCS lowest loop average temperature falls below the minimum temperature for criticality, the temperature should be restored within 15 minutes because operation with the reactor critical and temperature below the minimum temperature for criticality could violate the assumptions for accidents analyzed in the safety analyses. If the temperature cannot be restored within 15 minutes, the plant must be made subcritical within an additional 15 minutes. This action will place the plant in a safe condition in an orderly manner without challenging plant systems.

TABLE 15.4.1-2
MINIMUM FREQUENCIES FOR EQUIPMENT AND SAMPLING TESTS

	<u>Test</u>	<u>Frequency</u>
1. Reactor Coolant Samples	Gross Beta-gamma activity (excluding tritium)	5/week ⁽⁷⁾
	Tritium activity	Monthly
	Radiochemical E Determination	Semiannually ⁽²⁾⁽¹⁰⁾
	Isotopic Analysis for Dose Equivalent I-131 Concentration	Every two weeks ⁽¹⁾
	Isotopic Analysis for Iodine including I-131, I-133, and I-135	a.) Once per 4 hours whenever the specific activity exceeds 1.0 μ Ci/gram Dose Equivalent I-131 or 100/E μ Ci/gram. ⁽⁶⁾ b.) One sample between 2 and 6 hours following a thermal power change exceeding 15% of rated power in a one-hour period.
	Chloride Concentration	5/week ⁽⁸⁾
	Diss. Oxygen Conc.	5/week ⁽⁶⁾
	Fluoride Conc.	Weekly
2. Reactor Coolant Boron	Boron Concentration	Twice/week
3. Refueling Water Storage Tank Water Sample	Boron Concentration	Weekly ⁽⁶⁾
4. Boric Acid Tanks	Boron Concentration	Twice/week and after each BAST concentration change when they are being relied upon as a source of borated water.
5. Spray Additive Tank	NaOH Concentration	Monthly
6. Accumulator	Boron Concentration	Monthly

TABLE 15.4.1-2 (Continued)

	<u>Test</u>	<u>Frequency</u>
7. Spent Fuel Pit	a) Boron Concentration b) Water Level Verification	Monthly Weekly
8. Secondary Coolant	Gross Beta-gamma Activity or gamma isotopic analysis Iodine concentration	Weekly ⁽⁶⁾ Weekly when gross Beta-gamma activity equals or exceeds 1.2 $\mu\text{Ci/cc}$ ⁽⁶⁾
9. Control Rods	a) Rod drop times of all full length rods ⁽³⁾ b) Rodworth measurement	Each refueling or after maintenance that could affect proper functioning ⁽⁴⁾ Following each refueling shutdown prior to commencing power operation
10. Control Rod	Partial movement of all rods	Every 2 weeks ⁽¹⁸⁾
11. Pressurizer Safety Valves	Set point	Every five years ⁽¹¹⁾
12. Main Steam Safety Valves	Set Point	Every five years ⁽¹¹⁾
13. Containment Isolation Trip	Functioning	Each refueling shutdown
14. Refueling System Interlocks	Functioning	Each refueling shutdown
15. Service Water System	Functioning	Each refueling shutdown
16. Primary System Leakage	Evaluate	Monthly ⁽⁶⁾
17. Diesel Fuel Supply	Fuel inventory	Daily
18. Turbine Stop and Governor Valves	Functioning	Annually ⁽⁶⁾
19. Low Pressure Turbine Rotor Inspection ⁽⁵⁾	Visual and magnetic particle or liquid penetrant	Every five years
20. Boric Acid System	Storage Tank and piping temperatures \geq temperature required by Table 15.3.2-1	Daily ⁽¹⁹⁾

TABLE 15.4.1-2 (Continued)

	<u>Test</u>	<u>Frequency</u>
21. PORV Block Valves	a. Complete Valve Cycle b. Open position check	Quarterly ⁽¹³⁾ Every 72 hours ⁽¹⁴⁾
22. Integrity of Post Accident Recovery Systems Outside Containment	Evaluate	Each refueling cycle
23. Containment Purge Supply and Exhaust Isolation Valves	Verify valves are locked closed	Monthly ⁽⁹⁾
24. Reactor Trip Breakers	a. Verify independent operability of automatic shunt and undervoltage trip functions. b. Verify independent operability of manual trip to shunt and undervoltage trip functions.	Monthly ⁽⁹⁾ Each refueling shutdown
25. Reactor Trip Bypass Breakers	a. Verify operability of the undervoltage trip function. b. Verify operability of the shunt trip functions. c. Verify operability of the manual trip to undervoltage trip functions.	Prior to breaker use Each refueling shutdown Each refueling shutdown
26. 120 VAC Vital Instr. Bus Power	Verify Energized ⁽¹²⁾	Shiftly
27. Power Operated Relief Valves (PORVs), PORV Solenoid Air Control Valves, and Air System Check	Operate ⁽¹⁶⁾	Each shutdown ⁽¹⁵⁾
28. Atmospheric Steam Dumps	Complete valve cycle	Quarterly
29. Crossover Steam Dump System	Verify operability of each steam dump valve.	Quarterly

TABLE 15.4.1-2 (Continued)

30. Pressurizer Heaters	Verify that 100 KW of heaters are available.	Quarterly
31. CVCS Charging Pumps	Verify operability pumps. ⁽¹⁷⁾	Quarterly
32. Potential Dilution in Progress Alarm	Verify operability of alarm.	Prior to placing plant in cold shutdown.
33. Core Power Distribution	Perform power distribution maps using movable incore detector system to confirm hot channel factors.	Monthly ⁽²⁰⁾
34. Shutdown Margin	Perform shutdown margin calculation.	Daily ⁽²¹⁾

- (1) Required only during periods of power operation.
- (2) E determination will be started when the gross activity analysis of a filtered sample indicates $\geq 10\mu\text{Ci/cc}$ and will be redetermined if the primary coolant gross radioactivity of a filtered sample increases by more than $10\mu\text{Ci/cc}$.
- (3) Drop test shall be conducted at rated reactor coolant flow. Rods shall be dropped under both cold and hot condition, but cold drop tests need not be timed.
- (4) Drop tests will be conducted in the hot condition for rods on which maintenance was performed.
- (5) As accessible without disassembly of rotor.
- (6) Not required during periods of refueling shutdown.
- (7) At least once per week during periods of refueling shutdown.
- (8) At least three times per week (with maximum time of 72 hours between samples) during periods of refueling shutdown.
- (9) Not required during periods of cold or refueling shutdown, but must be performed prior to exceeding 200°F if it has not been performed during the previous surveillance period.
- (10) Sample to be taken after a minimum of 2 EFPD and 20 days power operation since the reactor was last subcritical for 48 hours or longer.
- (11) An approximately equal number of valves shall be tested each refueling outage such that all valves will be tested within a five year period. If any valve fails its tests, an additional number of valves equal to the number originally tested shall be tested. If any of the additional tested valves fail, all remaining valves shall be tested.
- (12) The specified buses shall be determined energized in the required manner at least once per shift by verifying correct static transfer switch alignment and indicated voltage on the buses.
- (13) Not required if the block valve is shut to isolate a PORV that is inoperable for reasons other than excessive seat leakage.
- (14) Only applicable when the overpressure mitigation system is in service.
- (15) Required to be performed only if conditions will be established, as defined in Specification 15.3.15, where the PORVs are used for low temperature overpressure protection. The test must be performed prior to establishing these conditions.

TABLE 15.4.1-2 (Continued)

- (16) Test valve operation in accordance with the inservice test requirements of the ASME Boiler and Pressure Vessel Code, Section XI.
- (17) Operability of charging pumps is verified by ensuring that the pumps develop the required flowrate, as specified by the In-Service Test Program.
- (18) Not required to be performed if the reactor is subcritical.
- (19) Required only when the BAST(s) are relied upon as a source of borated water.
- (20) Perform during power operation at effective full power monthly intervals. Following a refueling shutdown, a power distribution map shall be performed prior to exceeding 90% of rated thermal power.
- (21) Only applicable during low-power physics testing.