

MELLLA+/Extended Power Uprate

License Amendment Strategy

Acronyms in this presentation

- EN Energy Northwest
- CGS Columbia Generating Station
- MELLLA+ Maximum Load Line Limit Analysis Plus
- EPU Extended Power Uprate
- MUR Measurement Uncertainty Recapture
- LTP Licensed Thermal Power
- OLTP Original License Thermal Power
- CLTP Current Licensed Thermal Power
- SAR Safety Analysis Report
- PUSAR Power Uprate Safety Analysis Report
- MWt Mega-Watts thermal
- ATWS Anticipated Transient Without Scram



Combined Application Opening Remarks

- Energy Northwest (EN) is pursuing a combined application for Extended Power Uprate (EPU) and a Maximum Extended Load Line Limit Analysis Plus (MELLLA+) for the Columbia Generating Station.
- Columbia's application will result in 120% OLTP

Columbia Generation

	LTP	Amended	Increase from CLTP	Increase from OLTP
1983	3323 MWt			
1995	3486 MWt	Stretch	4.90%	4.90%
2017	3544 MWt	MUR	1.66%	6.65%
2031	3988 MWt	EPU	12.50%	20%



Why are we requesting this approach?

- Substitution Stress Stress
 - Increase operational flexibility and safety by reducing the number of rod manipulations during the cycle
 - MELLLA+ expands the operating domain
 - MELLLA+ needed to achieve / maintain EPU power

It reduces Operator burden thus safer operations



Why are we requesting this approach?

- Makes the plant easier to operate for Reactor Operators
- **Ease of operation reduces the risk of mistakes**
- Ease of operation equals less distraction and facilitates keeping a big picture view of all operating parameters

It reduces Operator burden thus safer operations



Power to Flow Map (NUREG/CR-7179)





Power to Flow Map





Benefit to Columbia's Operation

Improved Reactivity Management

- Fewer control rod manipulations at high power
- Fewer fuel conditioning flow ramps
- Reduces Operator burden
- Higher capacity factor (more electricity for the public)

Improved Fuel Reliability

- Pellet clad interaction (PCI) fuel conditioning margin.
- Improved Safety and Reliability
 - Less complicated fuel and core design
 - Less complicated cycle management



Licensing Operating Experience Inputs

- ▼ St. Lucie combined LAR for EPU and MUR
 - This represented a net increase in licensed thermal power of approximately 11.7% which includes a 10.0% EPU and a 1.7% MUR. Approved 9/24/2012

Turkey Point combined LAR for EPU and MUR

This represented a net increase in licensed thermal power of approximately 14.7% which includes a 13% EPU and a 1.7% MUR. Approved 6/15/2012

▼ Submittals from Monticello for EPU and MELLLA+

- This represents EPU / MELLLA+ submittals that were coinciding
- EPU was submitted 11/05/2008; approved 12/09/2013
- MELLLA+ was submitted 1/20/2010; approved 02/28/2014
- Browns Ferry (Most recent approvals)
 - EPU submitted 9/21/2015; approved 8/14/17
 - MELLLA+ submitted 2/23/2018; approved 12/26/2019
- Evolving NRC Guidance



Columbia's Licensing Action Request

- Columbia will submit a combined licensing action
 This will combine MELLLA+ and EPU submittals
- Columbia's submittal is in the interest of public health, safety, and security as it will reduce operator burden
 - Makes the plant easier to operate for Reactor Operators
 - Ease of operation reduces the risk of mistakes
 - Ease of operation equals less distraction and facilitates keeping a big picture view of all operating parameters



Safety Analysis Report (SAR)

Evelopment of Combined MELLLA+/EPU SAR

- The Combined SAR will have all relevant information for both MELLLA+ and EPU and:
 - Incorporates NRC's Review Standard for EPU (RS-001 rev 0) guidance into the development of the Extended Power Uprate Safety Analysis Report (PUSAR) as the base document
 - Adds MELLLA+ SAR language into applicable PUSAR sections.
 - Adds unique, MELLLA+ SAR topics as new sections in PUSAR (e.g., ATWS instability)
 - PUSAR sections not impacted by MELLLA+ clearly identify no impact (e.g., AC Power Systems)
- Combining MELLLA+ and EPU submittals results in synergies for both the licensee and the approvers



Takeaways

- EN will submit a combined license amendment request (in CY 2028) summarizing:
 - The necessary analysis to expand the operating domain via MELLLA+ and to increase thermal power to an EPU power level of 3988 MWt

➤ The submittal will:

- Conform with RS-001 and applicable NRC approved topical reports
- Align with submittals by St. Lucie, Turkey Point, and Monticello
- Support implementation in Columbia's 2031 refueling outage
- The submittal will not include MUR

