

June 23, 1993

Docket Nos. 50-250  
and 50-251

Mr. J. H. Goldberg  
President - Nuclear Division  
Florida Power and Light Company  
P. O. Box 14000  
Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: ADMINISTRATIVE CORRECTION TO AMENDMENT NO.154 TO FACILITY OPERATING  
LICENSE DPR-31-TURKEY POINT UNIT 3 (TAC NO. M86203)

On June 15, 1993, the Nuclear Regulatory Commission issued Amendment No.154 to Facility Operating License No. DPR-31 for the Turkey Point Unit 3 to change the Technical Specifications (TS) relating to the Movable In-core Detector System. This amendment is applicable only to Unit 3 for the remainder of its Cycle 13 operation.

Our June 15, 1993 letter provided instructions to remove the existing TS pages and replace them with the revised TS pages. Since the Turkey Point Units 3 and 4 have common TS and License Amendment No 154 is applicable only to Unit 3 for the remainder of Cycle 13, the instructions provided in our June 15, 1993 letter requires clarification. The TS pages approved by Amendment No. 154 are assigned new page numbers. These TS pages will become void at the end of Unit 3 Cycle 13 and should be removed from the TS at that time. Existing TS pages should be left in place since they are currently applicable to Unit 4, and to Unit 3 after Cycle 13. This process would reestablish the commonality of the TS for the Units 3 and 4 at the end of Unit 3 Cycle 13.

For the sake of completeness, all of the relevant TS pages are enclosed. If you have any questions regarding this matter, please contact me at (301) 504-1471.

Sincerely,



L. Raghavan, Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II  
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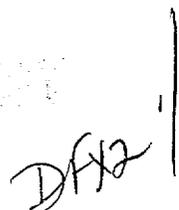
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Mr. J. H. Goldberg  
Florida Power and Light Company

Turkey Point Plant

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ATTACHMENT TO CORRECTION TO LICENSE AMENDMENT  
AMENDMENT NO. 154 TO FACILITY OPERATING LICENSE NO. DPR-31

DOCKET NO. 50-250

Revise Appendix A as follows:

TS pages applicable for Unit 3 for the remainder of its Cycle 13. These pages should be removed at the end of Cycle 13.

Insert New Pages

3/4 2-6 a  
3/4 2-9 a  
3/4 2-10 a  
3/4 2-12 a  
3/4 3-40 a  
B 3/4 2-4 a  
B 3/4 2-5 a  
B 3-4 2-6 a

TS pages currently applicable to Unit 4 and to Unit 3 after Cycle 13 are provided for the sake of completeness only.

3/4 2-6  
3/4 2-9  
3/4 2-10  
3/4 2-12  
3/4 3-40  
B 3/4 2-4  
B 3/4 2-5  
B 3/4 2-6

POWER DISTRIBUTION LIMITS

SURVEILLANCE REQUIREMENTS

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4.2.2.1 If  $[F_Q]^P$  as predicted by approved physics calculations is greater than  $[F_Q]^L$  and P is greater than  $P_T^*$  as defined in 4.2.2.2,  $F_Q(Z)$  shall be evaluated by MIDS (Specification 4.2.2.2), BASE LOAD (Specification 4.2.2.3) or RADIAL BURNDOWN (Specification 4.2.2.4) to determine if  $F_Q$  is within its limit  $[F_Q]^P = \text{Predicted } F_Q$ .

If  $[F_Q]^P$  is less than  $[F_Q]^L$  or P is less than  $P_T$ ,  $F_Q(Z)$  shall be evaluated to determine if  $F_Q(Z)$  is within its limit as follows:

- a. Using the movable incore detectors to obtain power distribution map at any THERMAL POWER greater than 5% of RATED THERMAL POWER.
- b. Increasing the measured  $F_Q(Z)$  component of the power distribution map by 3% to account for manufacturing tolerances and further increasing the value by 5% to account for measurement uncertainties. Verifying that the requirements of Specification 3.2.2 are satisfied. For Unit 3 Cycle 13, when the number of operable movable detector thimbles (T) is less than 75% (38) of the total, the 5%  $F_Q$  measurement uncertainty shall be increased to  $[5 + 4(3-T/12.5)]\%$  where T (the number of operable detector thimbles), must be greater than or equal to 50% (25) of the total number of thimbles.
- c.  $F_Q^M(Z) \leq F_Q^L(Z)$   
Where  $F_Q^M(Z)$  is the measured  $F_Q(Z)$  increased by the allowance for manufacturing tolerances and measurement uncertainty and  $F_Q^L(Z)$  is the  $F_Q$  limit defined in 3.2.2.
- d. Measuring  $F_Q^M(Z)$  according to the following schedule:
  - 1. Prior to exceeding 75% of RATED THERMAL POWER,\*\* after refueling,
  - 2. At least once per 31 Effective Full Power Days.
- e. With the relationship specified in Specification 4.2.2.1.c above not being satisfied:
  - 1) Calculate the percent  $F_Q^M(Z)$  exceeds its limit by the following expression:

$$\left[ \frac{F_Q^M(Z)}{[F_Q]^L \times K(Z)/P} - 1 \right] \times 100 \text{ for } P \geq 0.5$$

$$\left[ \frac{F_Q^M(Z)}{[F_Q]^L \times K(Z)/0.5} - 1 \right] \times 100 \text{ for } P < 0.5$$

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\*  $P_T$  = Reactor power level at which predicted  $F_Q$  would exceed its limit.  
\*\* During power escalation at the beginning of each cycle, power level may be increased until a power level for extended operation has been achieved and power distribution map obtained.

POWER DISTRIBUTION LIMITS

SURVEILLANCE REQUIREMENTS (Continued)

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- c) After 24 hours have elapsed, take a full core flux map to determine  $F_Q^M(Z)$  unless a valid full core flux map was taken within the time period specified in 4.2.2.1d.
- d) Calculate  $P_{BL}$  per 4.2.2.3b.
- b. Base Load operation is permitted provided:
  - 1. THERMAL POWER is maintained between  $P_T$  and  $P_{BL}$  or between  $P_T$  and 100% (whichever is most limiting).
  - 2. AFD (Delta-I) is maintained within a  $\pm 2\%$  or  $\pm 3\%$  target band.
  - 3. Full core flux maps are taken at least once per 31 effective Full Power Days.

$P_{BL}$  and  $P_T$  are defined as:

$$P_{BL} = \frac{[F_Q]^L \times K(Z)}{F_Q^M(Z) \times W(Z) \times BL \times U_{BL}}$$

$$P_T = [F_Q]^L / [F_Q]^P$$

where:  $F_Q^M(Z)$  is the measured  $F_Q(Z)$  with no allowance for manufacturing tolerances or measurement uncertainty. For the purpose of this Specification  $[F_Q^M(Z)]$  shall be obtained between elevations bounded by 10% and 90% of the active core height.  $[F_Q]^L$  is the  $F_Q$  limit.  $K(Z)$  is given in Figure 3.2-2.  $W(Z)_{BL}$  is the cycle dependent function that accounts for limited power distribution transients encountered during base load operation.

The function is given in the Peaking Factor Limit Report as per Specification 6.9.1.6.  $U_{BL}$  is defined as the Base Load uncertainty factor that accounts for: manufacturing tolerance, measurement error, rod bow and any burnup and power dependent peaking factor increases. With at least 75% (38) of the detector thimbles operable,  $U_{BL}$  is 9%. For Unit 3 Cycle 13, when the number of operable movable detector thimbles (T) is less than 75% (38) of the total,  $U_{BL}$  uncertainty shall be increased to:

$$[9 + 4(3-T/12.5)]\%$$

where T (the number of operable detector thimbles), must be greater than or equal to 50% (25) of the total number of thimbles.

- c. During Base Load operation, if the THERMAL POWER is decreased below  $P_T$ , then the conditions of 4.2.2.3.a shall be satisfied before re-entering Base Load operation.
- d. If any of the conditions of 4.2.2.3b are not maintained, reduce THERMAL POWER to less than or equal to  $P_T$ , or, within 15 minutes initiate the Augmented Surveillance (MIDS) requirements of 4.2.2.2.

## POWER DISTRIBUTION LIMITS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### 4.2.2.4 RADIAL BURNDOWN

Operation is permitted at powers above  $P_T$  if the following Radial Burndown conditions are satisfied:

- a. Radial Burndown operation is restricted to use at powers between  $P_T$  and  $P_{RB}$  or  $P_T$  and 1.00 (whichever is most limiting). The maximum relative power permitted under Radial Burndown operation,  $P_{RB}$ , is equal to the minimum value of the ratio of  $[F_Q^L(Z)]/[F_Q(Z)]_{RB}$  Meas.

where:  $[F_Q(Z)]_{RB}$  Meas. =  $[F_{xy}(Z)]_{Map}$  Meas. x  $F_z(Z)$  x  $U_{RB}$  and

$[F_Q^L(Z)]$  is equal to  $[F_Q^L]$  x  $K(Z)$ .

- b. A full core flux map to determine  $(F_{xy}(Z))_{Map}$  Meas. shall be taken within the time period specified in Section 4.2.2.1d.2. For the purpose of the specification,  $(F_{xy}(Z))_{Map}$  Meas. shall be obtained between the elevations bounded by 10% and 90% of the active core height.
- c. The function  $F_z(Z)$ , provided in the Peaking Factor Limit Report (6.9.1.6), is determined analytically and accounts for the most perturbed axial power shapes which can occur under axial power distribution control.  $U_{RB}$  is defined as the Radial Burndown uncertainty factor that accounts for: manufacturing tolerance, measurement error, rod bow and any burnup and power dependent peaking factor increases. With at least 75% (38) of the detector thimbles operable,  $U_{RB}$  is 9%. For Unit 3 Cycle 13, when the number of operable movable detector thimbles (T) is less than 75% (38) of the total,  $U_{RB}$  uncertainty shall be increased to:

$$[9 + 4(3-T/12.5)]\%$$

where T (the number of operable detector thimbles), must be greater than or equal to 50% (25) of the total number of thimbles.

- d. Radial Burndown operation may be utilized at powers between  $P_T$  and  $P_{RB}$ , or,  $P_T$  and 1.00 (whichever is most limiting) provided that the AFD (Delta-I) is within  $\pm 5\%$  of the target axial offset.
- e. If the requirements of Section 4.2.2.4d are not maintained, then the power shall be reduced to less than or equal to  $P_T$ , or within 15 minutes Augmented Surveillance of hot channel factors shall be initiated if the power is above  $P_T$ .

4.2.2.5 When  $F_Q(Z)$  is measured for reasons other than meeting the requirements of Specifications 4.2.2.1, 4.2.2.2, 4.2.2.3 or 4.2.2.4 an overall measured  $F_Q(Z)$  shall be obtained from a power distribution map and increased by 3% to account for manufacturing tolerances and further increased by 5% to account for measurement uncertainty. For Unit 3 Cycle 13, when the number of operable movable detector thimbles (T) is less than 75% (38) of the total, the 5%  $F_Q$  measurement uncertainty shall be increased to  $[5 + 4(3-T/12.5)]\%$  where T (the number of operable detector thimbles), must be greater than or equal to 50% (25) of the total number of thimbles.

POWER DISTRIBUTION LIMITS

SURVEILLANCE REQUIREMENTS

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4.2.3.1 The provisions of Specification 4.0.4 are not applicable.

4.2.3.2 When a measurement of  $F_{AH}^N$  is taken, the measured  $F_{AH}^N$  shall be increased by 4% to account for measurement error. For Unit 3 Cycle 13, when the number of operable movable detector thimbles (T) is less than 75% (38) of the total, the 4%  $F_{AH}^N$  measurement uncertainty shall be increased to  $[4 + 2(3-T/12.5)]\%$  where T (the number of operable detector thimbles), must be greater than or equal to 50% (25) of the total number of thimbles.

4.2.3.3 This corrected  $F_{AH}^N$  shall be determined to be within its limit through incore flux mapping:

- a. Prior to operation above 75% of RATED THERMAL POWER after each fuel loading, and
- b. At least once per 31 Effective Full Power Days.

INSTRUMENTATION

MOVABLE INCORE DETECTORS

LIMITING CONDITION FOR OPERATION  
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3.3.3.2 The Movable Incore Detection System shall be OPERABLE with:

- a. At least 16 detector thimbles when used for recalibration and check of the Excore Neutron Flux Detection System and monitoring the QUADRANT POWER TILT RATIO \*, and at least 38\*\* detector thimbles when used for monitoring  $F_{AH}^N$ ,  $F_Q(Z)$  and  $F_{xy}(Z)$ .
- b. A minimum of two detector thimbles per core quadrant (For Unit 3 Cycle 13, a minimum of three (3) detector thimbles per quadrant whenever the number of operable detector thimbles is less than 38 where two sets of quadrants are defined: 1) quadrants formed by the vertical and horizontal axes of the core and 2) quadrants formed by the two diagonals of the core. These quadrants are defined such that the instrument locations along the axes dividing the quadrants are included in each of those adjacent quadrants as whole thimbles), and
- c. Sufficient movable detectors, drive, and readout equipment to map these thimbles.

APPLICABILITY: When the Movable Incore Detection System is used for:

- a. Recalibration of the Excore Neutron Flux Detection System, or
- b. Monitoring the QUADRANT POWER TILT RATIO \*, or
- c. Measurement of  $F_{AH}^N$ ,  $F_Q(Z)$  and  $F_{xy}(Z)$ .

ACTION:

With the Movable Incore Detection System inoperable, do not use the system for the above applicable monitoring or calibration functions. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS  
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4.3.3.2 The Movable Incore Detection System shall be demonstrated OPERABLE at least once per 24 hours by normalizing each detector output when required for:

- a. Recalibration of the Excore Neutron Flux Detection System, or
- b. Monitoring the QUADRANT POWER TILT RATIO \*, or
- c. Measurement of  $F_{AH}^N$ ,  $F_Q(Z)$  and  $F_{xy}(Z)$ .

\* Exception to the 16 detector thimble requirement of monitoring the QUADRANT POWER TILT RATIO is acceptable when performing Specification 4.2.4.2 using two sets of four symmetric thimbles.

\*\* The minimum number of operable detector thimbles is 25 (Unit 3 Cycle 13 only).

## POWER DISTRIBUTION LIMITS

### BASES

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#### 3/4.2.2 and 3/4.2.3 HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR

The limits on heat flux hot channel factor and nuclear enthalpy rise hot channel factor ensure that: (1) the design limits on peak local power density and minimum DNBR are not exceeded and (2) in the event of a LOCA the peak fuel clad temperature will not exceed the 2200°F ECCS acceptance criteria limit. The LOCA peak fuel clad temperature limit may be sensitive to the number of steam generator tubes plugged. The current limit is valid for tube plugging levels up to 5%.

$F_Q(Z)$ , Heat Flux Hot Channel Factor, is defined as the maximum local heat flux on the surface of a fuel rod at core elevation Z divided by the average fuel rod heat flux.

$F_{AH}^N$ , Nuclear Enthalpy Rise Hot Channel Factor, is defined as the ratio of the integral of linear power along the rod with the highest integrated power to the average rod power.

Each of these is measurable but will normally only be determined periodically as specified in Specifications 4.2.2 and 4.2.3. This periodic surveillance is sufficient to ensure that the limits are maintained provided:

- a. Control rods in a single group move together with no individual rod insertion differing by more than  $\pm 12$  steps, indicated, from the group demand position;
- b. Control rod groups are sequenced with overlapping groups as described in Specification 3.1.3.6;
- c. The control rod insertion limits of Specifications 3.1.3.5 and 3.1.3.6 are maintained; and
- d. The axial power distribution, expressed in terms of AXIAL FLUX DIFFERENCE, is maintained within the limits.

When an  $F_Q$  measurement is taken, both experimental error and manufacturing tolerance must be allowed for. Five percent\* is the appropriate allowance for a full core map taken with the movable incore detector flux mapping system and three percent is the appropriate allowance for manufacturing tolerance. These uncertainties only apply if the map is taken for purposes other than the determination of  $P_{BL}$  and  $P_{RE}$ .

$F_{AH}^N$  will be maintained within its limits provided Conditions a. through d. above are maintained.

In the specified limit of  $F_{AH}^N$  there is an 8 percent allowance for uncertainties which means that normal operation of the core is expected to result in  $F_{AH}^N \leq 1.62/1.08$ . The logic behind the larger uncertainty in this

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\* For Unit 3 Cycle 13, this uncertainty was increased to accommodate a reduced number of operable detector thimbles.

## POWER DISTRIBUTION LIMITS

### BASES

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#### HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (Continued)

case is that (a) normal perturbations in the radial power shape (e.g., rod misalignment) affect  $F_{AH}^N$ , in most cases without necessarily affecting  $F_Q$ , (b) although the operator has a direct influence on  $F_Q$  through movement of rods, and can limit it to the desired influence on  $F_Q$  through movement of rods, and can limit it to the desired value, he has no direct control over  $F_{AH}^N$  and (c) an error in the prediction 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  $F_{AH}^N$  is less readily available. When a measurement of  $F_{AH}^N$  is taken, experimental error must be allowed for and 4%\* is the appropriate allowance for a full core map taken with the movable incore detector flux mapping system.

The following are independent augmented surveillance methods used to ensure peaking factors are acceptable for continued operation above Threshold Power,  $P_T$ :

Base Load - This method uses the following equation to determine peaking factors:

$$F_{QEL} = F_Q(Z) \text{ measured} \times 1.09^* \times W(Z)_{BL}$$

where:  $W(Z)_{BL}$  = accounts for power shapes;

1.09\* = accounts for uncertainty;

$F_Q(Z)$  = measured data;

$F_{QEL}$  = Base load peaking factor.

The analytically determined  $[F_Q]^P$  is formulated to generate limiting shapes for all load follow maneuvers consistent with control to a  $\pm 5\%$  band about the target flux difference. For Base Load operation the severity of the shapes that need to be considered is significantly reduced relative to load follow operation;

The severity of possible shapes is small due to the restrictions imposed by Sections 4.2.2.3. To quantify the effect of the limiting transients which could occur during Base Load operation, the function  $W(Z)_{BL}$  is calculated from the following relationship:

$$W(Z)_{BL} = \text{Max} \left[ \frac{F_Q(Z) (\text{Base Load Case(s), 150 MWD/T})}{F_Q(Z) (\text{ARO, 150 MWD/T})}, \frac{F_Q(Z) (\text{Base Case(s), 85\% BOL BU})}{F_Q(Z) (\text{ARO, 85\% BOL BU})} \right]$$

Radial Burndown - This method uses the following equation to determine peaking factors.

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\* For Unit 3 Cycle 13, this uncertainty was increased to accommodate a reduced number of operable detector thimbles.

POWER DISTRIBUTION LIMITS

BASES

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HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR  
(Continued)

$$F_Q(Z)_{R.B.} = F_{xy}(Z)_{measured} \times F_z(Z) \times 1.09^*$$

where: 1.09\* = accounts for uncertainty

$F_z(Z)$  = accounts for axial power shapes

$F_{xy}(Z)_{measured}$  = ratio of peak power density to average power density at elevation(Z)

$F_Q(Z)_{R.B.}$  = Radial Burndown Peaking Factor.

For Radial Burndown operation the full spectrum of possible shapes consistent with control to a  $\pm 5\%$  Delta-I band needs to be considered in determining power capability. Accordingly, to quantify the effect of the limiting transients which could occur during Radial Burndown operation, the function  $F_z(Z)$  is calculated from the following relationship:

$$F_z(Z) = [F_Q(Z)] \text{ FAC Analysis} / [F_{xy}(Z)] \text{ ARO}$$

The essence of the procedure is to maintain the xenon distribution in the core as close to the equilibrium full power condition as possible. This can be accomplished by using the boron system to position the full length control rods to produce the require indicated flux difference.

Above the power level of  $P_T$ , additional flux shape monitoring is required. In order to assure that the total power peaking factor,  $F_Q$ , is maintained at or below the limiting value, the movable incore instrumentation will be utilized. Thimbles are selected initially during startup physics tests so that the measurements are representative of the peak core power density. By limiting the core average axial power distribution, the total power peaking factor  $F_Q$  can be limited since all other components remain relatively fixed. The remaining part of the total power peaking factor can be derived from incore measurements, i.e., an effective radial peaking factor  $\bar{R}$ , can be determined as the ratio of the total peaking factor resulting from a full core flux map and the axial peaking factor in a selected thimble.

The limiting value of  $[F_j(Z)]_s$  is derived as follows:

$$[F_j(Z)]_s = \frac{[F_Q]^L \times [K(Z)]}{P_L \bar{R}_j (1 + \sigma_j)(1.03)(1.07)}$$

Where:

- a)  $F_j(Z)$  is the normalized axial power distribution from thimble j at elevation Z.

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\* For Unit 3 Cycle 13, this uncertainty was increased to accommodate a reduced number of operable detector thimbles.

## POWER DISTRIBUTION LIMITS

### SURVEILLANCE REQUIREMENTS

4.2.2.1 If  $[F_Q]^P$  as predicted by approved physics calculations is greater than  $[F_Q]^L$  and P is greater than  $P_T^*$  as defined in 4.2.2.2,  $F_Q(Z)$  shall be evaluated by MIDS (Specification 4.2.2.2), BASE LOAD (Specification 4.2.2.3) or RADIAL BURNDOWN (Specification 4.2.2.4) to determine if  $F_Q$  is within its limit  $[F_Q]^P = \text{Predicted } F_Q$ .

If  $[F_Q]^P$  is less than  $[F_Q]^L$  or P is less than  $P_T$ ,  $F_Q(Z)$  shall be evaluated to determine if  $F_Q(Z)$  is within its limit as follows:

- a. Using the movable incore detectors to obtain power distribution map at any THERMAL POWER greater than 5% of RATED THERMAL POWER.
- b. Increasing the measured  $F_Q(Z)$  component of the power distribution map by 3% to account for manufacturing tolerances and further increasing the value by 5% to account for measurement uncertainties. Verifying that the requirements of Specification 3.2.2 are satisfied.
- c.  $F_Q^M(Z) \leq F_Q^L(Z)$   
Where  $F_Q^M(Z)$  is the measured  $F_Q(Z)$  increased by the allowance for manufacturing tolerances and measurement uncertainty and  $F_Q^L(Z)$  is the  $F_Q$  limit defined in 3.2.2.
- d. Measuring  $F_Q^M(Z)$  according to the following schedule:
  1. Prior to exceeding 75% of RATED THERMAL POWER,\*\* after refueling,
  2. At least once per 31 Effective Full Power Days.
- e. With the relationship specified in Specification 4.2.2.1.c above not being satisfied:
  - 1) Calculate the percent  $F_Q^M(Z)$  exceeds its limit by the following expression:

$$\left[ \left[ \frac{F_Q^M(Z)}{[F_Q]^L \times K(Z)/P} \right] - 1 \right] \times 100 \text{ for } P \geq 0.5$$
$$\left[ \left[ \frac{F_Q^M(Z)}{[F_Q]^L \times K(Z)/0.5} \right] - 1 \right] \times 100 \text{ for } P < 0.5$$

\* $P_T$  = Reactor power level at which predicted  $F_Q$  would exceed its limit.

\*\*During power escalation at the beginning of each cycle, power level may be increased until a power level for extended operation has been achieved and power distribution map obtained.

POWER DISTRIBUTION LIMITS

SURVEILLANCE REQUIREMENTS (Continued)

- c) After 24 hours have elapsed, take a full core flux map to determine  $F_Q^M(Z)$  unless a valid full core flux map was taken within the time period specified in 4.2.2.1d.
  - d) Calculate  $P_{BL}$  per 4.2.2.3b.
- b. Base Load operation is permitted provided:
- 1. THERMAL POWER is maintained between  $P_T$  and  $P_{BL}$  or between  $P_T$  and 100% (whichever is most limiting).
  - 2. AFD (Delta-I) is maintained within a  $\pm 2\%$  or  $\pm 3\%$  target band.
  - 3. Full core flux maps are taken at least once per 31 effective Full Power Days.

$P_{BL}$  and  $P_T$  are defined as:

$$P_{BL} = \frac{[F_Q]^L \times K(Z)}{F_Q^M(Z) \times W(Z)_{BL} \times 1.09}$$

$$P_T = [F_Q]^L / [F_Q]^P$$

where:  $F_Q^M(Z)$  is the measured  $F_Q(Z)$  with no allowance for manufacturing tolerances or measurement uncertainty. For the purpose of this Specification  $[F_Q^M(Z)]$  shall be obtained between elevations bounded by 10% and 90% of the active core height.  $[F_Q]^L$  is the  $F_Q$  limit.  $K(Z)$  is given in Figure 3.2-2.  $W(Z)_{BL}$  is the cycle dependent function that accounts for limited power distribution transients encountered during base load operation.

The function is given in the Peaking Factor Limit Report as per Specification 6.9.1.6. The 9% uncertainty factor accounts for manufacturing tolerance, measurement error, rod bow and any burnup and power dependent peaking factor increases.

- c. During Base Load operation, if the THERMAL POWER is decreased below  $P_T$ , then the conditions of 4.2.2.3.a shall be satisfied before re-entering Base Load operation.
- d. If any of the conditions of 4.2.2.3b are not maintained, reduce THERMAL POWER to less than or equal to  $P_T$ , or, within 15 minutes initiate the Augmented Surveillance (MIDS) requirements of 4.2.2.2.

## POWER DISTRIBUTION LIMITS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### 4.2.2.4 RADIAL BURNDOWN

Operation is permitted at powers above  $P_T$  if the following Radial Burndown conditions are satisfied:

- a. Radial Burndown operation is restricted to use at powers between  $P_T$  and  $P_{RB}$  or  $P_T$  and 1.00 (whichever is most limiting). The maximum relative power permitted under Radial Burndown operation,  $P_{RB}$ , is equal to the minimum value of the ratio of  $[F_Q^L(Z)]/[F_Q(Z)]_{RB}$  Meas. where:  $[F_Q(Z)]_{RB}$  Meas. =  $[F_{xy}(Z)]_{Map}$  Meas.  $\times F_z(Z) \times 1.09$  and  $[F_Q^L(Z)]$  is equal to  $[F_Q^L] \times K(Z)$ .
- b. A full core flux map to determine  $[F_{xy}(Z)]_{Map}$  Meas. shall be taken within the time period specified in Section 4.2.2.1d.2. For the purpose of the specification,  $[F_{xy}(Z)]_{Map}$  Meas. shall be obtained between the elevations bounded by 10% and 90% of the active core height.
- c. The function  $F_z(Z)$ , provided in the Peaking Factor Limit Report (6.9.1.6), is determined analytically and accounts for the most perturbed axial power shapes which can occur under axial power distribution control. The uncertainty factor of 9% accounts for manufacturing tolerances, measurement error, rod bow, and any burnup dependent peaking factor increases.
- d. Radial Burndown operation may be utilized at powers between  $P_T$  and  $P_{RB}$ , or,  $P_T$  and 1.00 (whichever is most limiting) provided that the AFD (Delta-I) is within  $\pm 5\%$  of the target axial offset.
- e. If the requirements of Section 4.2.2.4d are not maintained, then the power shall be reduced to less than or equal to  $P_T$ , or within 15 minutes Augmented Surveillance of hot channel factors shall be initiated if the power is above  $P_T$ .

4.2.2.5 When  $F_Q(Z)$  is measured for reasons other than meeting the requirements of Specifications 4.2.2.1, 4.2.2.2, 4.2.2.3 or 4.2.2.4 an overall measured  $F_Q(Z)$  shall be obtained from a power distribution map and increased by 3% to account for manufacturing tolerances and further increased by 5% to account for measurement uncertainty.

## POWER DISTRIBUTION LIMITS

### SURVEILLANCE REQUIREMENTS

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- 4.2.3.1 The provisions of Specification 4.0.4 are not applicable.
- 4.2.3.2 When a measurement of  $F_{\Delta H}^N$  is taken, the measured  $F_{\Delta H}^N$  shall be increased by 4% to account for measurement error.
- 4.2.3.3 This corrected  $F_{\Delta H}^N$  shall be determined to be within its limit through incore flux mapping:
- a. Prior to operation above 75% of RATED THERMAL POWER after each fuel loading, and
  - b. At least once per 31 Effective Full Power Days.

## INSTRUMENTATION

### MOVABLE INCORE DETECTORS

#### LIMITING CONDITION FOR OPERATION

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- 3.3.3.2 The Movable Incore Detection System shall be OPERABLE with:
- At least 16 detector thimbles when used for recalibration and check of the Excore Neutron Flux Detection System and monitoring the QUADRANT POWER TILT RATIO\*, and at least 38 detector thimbles when used for monitoring  $F_{\Delta H}^N$ ,  $F_Q(Z)$  and  $F_{xy}(Z)$ .
  - A minimum of two detector thimbles per core quadrant, and
  - Sufficient movable detectors, drive, and readout equipment to map these thimbles.

APPLICABILITY: When the Movable Incore Detection System is used for:

- Recalibration of the Excore Neutron Flux Detection System, or
- Monitoring the QUADRANT POWER TILT RATIO\*, or
- Measurement of  $F_{\Delta H}^N$ ,  $F_Q(Z)$  and  $F_{xy}(Z)$ .

ACTION:

With the Movable Incore Detection System inoperable, do not use the system for the above applicable monitoring or calibration functions. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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- 4.3.3.2 The Movable Incore Detection System shall be demonstrated OPERABLE at least once per 24 hours by normalizing each detector output when required for:
- Recalibration of the Excore Neutron Flux Detection System, or
  - Monitoring the QUADRANT POWER TILT RATIO\*, or
  - Measurement of  $F_{\Delta H}^N$ ,  $F_Q(Z)$  and  $F_{xy}(Z)$ .

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\*Exception to the 16 detector thimble requirement of monitoring the QUADRANT POWER TILT RATIO is acceptable when performing Specification 4.2.4.2 using two sets of four symmetric thimbles.

## POWER DISTRIBUTION LIMITS

### BASES

#### 3/4.2.2 and 3/4.2.3 HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR

The limits on heat flux hot channel factor and nuclear enthalpy rise hot channel factor ensure that: (1) the design limits on peak local power density and minimum DNBR are not exceeded and (2) in the event of a LOCA the peak fuel clad temperature will not exceed the 2200°F ECCS acceptance criteria limit. The LOCA peak fuel clad temperature limit may be sensitive to the number of steam generator tubes plugged. The current limit is valid for tube plugging levels up to 5%.

$F_Q(Z)$ , Heat Flux Hot Channel Factor, is defined as the maximum local heat flux on the surface of a fuel rod at core elevation  $Z$  divided by the average fuel rod heat flux.

$F_{\Delta H}^N$  Nuclear Enthalpy Rise Hot Channel Factor, is defined as the ratio of the integral of linear power along the rod with the highest integrated power to the average rod power.

Each of these is measurable but will normally only be determined periodically as specified in Specifications 4.2.2 and 4.2.3. This periodic surveillance is sufficient to ensure that the limits are maintained provided:

- a. Control rods in a single group move together with no individual rod insertion differing by more than  $\pm 12$  steps, indicated, from the group demand position;
- b. Control rod groups are sequenced with overlapping groups as described in Specification 3.1.3.6;
- c. The control rod insertion limits of Specifications 3.1.3.5 and 3.1.3.6 are maintained; and
- d. The axial power distribution, expressed in terms of AXIAL FLUX DIFFERENCE, is maintained within the limits.

When an  $F_Q$  measurement is taken, both experimental error and manufacturing tolerance must be allowed for. Five percent is the appropriate allowance for a full core map taken with the movable incore detector flux mapping system and three percent is the appropriate allowance for manufacturing tolerance. These uncertainties only apply if the map is taken for purposes other than the determination of  $P_{BL}$  and  $P_{RB}$ .

$F_{\Delta H}^N$  will be maintained within its limits provided Conditions a. through d. above are maintained.

In the specified limit of  $F_{\Delta H}^N$ , there is an 8 percent allowance for uncertainties which means that normal operation of the core is expected to result in  $F_{\Delta H}^N \leq 1.62/1.08$ . The logic behind the larger uncertainty in this

## POWER DISTRIBUTION LIMITS

### BASES

#### HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (Continued)

case is that (a) normal perturbations in the radial power shape (e.g., rod misalignment) affect  $F_{\Delta H}^N$ , in most cases without necessarily affecting  $F_Q$ , (b) although the operator has a direct influence on  $F_Q$  through movement of rods, and can limit it to the desired influence on  $F_Q$  through movement of rods, and can limit it to the desired value, he has no direct control over  $F_{\Delta H}^N$  and (c) an error in the prediction 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 4% is the appropriate allowance for a full core map taken with the movable incore detector flux mapping system.

The following are independent augmented surveillance methods used to ensure peaking factors are acceptable for continued operation above Threshold Power,  $P_T$ :

Base Load - This method uses the following equation to determine peaking factors:

$$F_{QBL} = F_Q(Z) \text{ measured} \times 1.09 \times W(Z)_{BL}$$

where:  $W(Z)_{BL}$  = accounts for power shapes;  
1.09 = accounts for uncertainty;  
 $F_Q(Z)$  = measured data;  
 $F_{QBL}$  = Base load peaking factor.

The analytically determined  $[F_Q]^P$  is formulated to generate limiting shapes for all load follow maneuvers consistent with control to a  $\pm 5\%$  band about the target flux difference. For Base Load operation the severity of the shapes that need to be considered is significantly reduced relative to load follow operation.

The severity of possible shapes is small due to the restrictions imposed by Sections 4.2.2.3. To quantify the effect of the limiting transients which could occur during Base Load operation, the function  $W(Z)_{BL}$  is calculated from the following relationship:

$$W(Z)_{BL} = \text{Max} \left[ \frac{F_Q(Z) \text{ (Base Load Case(s), 150 MWD/T)}}{F_Q(Z) \text{ (ARO, 150 MWD/T)}}, \frac{F_Q(Z) \text{ (Base Case(s), 85\% EOL BU)}}{F_Q(Z) \text{ (ARO, 85\% BOL BU)}} \right]$$

Radial Burndown - This method uses the following equation to determine peaking factors.

## POWER DISTRIBUTION LIMITS

### BASES

#### HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (Continued)

$$F_Q(Z)_{R.B.} = F_{xy}(Z)_{\text{measured}} \times F_z(Z) \times 1.09$$

where: 1.09 = accounts for uncertainty

$F_z(Z)$  = accounts for axial power shapes

$F_{xy}(Z)_{\text{measured}}$  = ratio of peak power density to average power density at elevation(Z)

$F_Q(Z)_{R.B.}$  = Radial Burndown Peaking Factor.

For Radial Burndown operation the full spectrum of possible shapes consistent with control to a  $\pm 5\%$  Delta-I band needs to be considered in determining power capability. Accordingly, to quantify the effect of the limiting transients which could occur during Radial Burndown operation, the function  $F_z(Z)$  is calculated from the following relationship:

$$F_z(Z) = [F_Q(Z)] \text{ FAC Analysis} / [F_{xy}(Z)] \text{ ARO}$$

The essence of the procedure is to maintain the xenon distribution in the core as close to the equilibrium full power condition as possible. This can be accomplished by using the boron system to position the full length control rods to produce the require indicated flux difference.

Above the power level of  $P_T$ , additional flux shape monitoring is required.

In order to assure that the total power peaking factor,  $F_Q$ , is maintained at or below the limiting value, the movable incore instrumentation will be utilized. Thimbles are selected initially during startup physics tests so that the measurements are representative of the peak core power density. By limiting the core average axial power distribution, the total power peaking factor  $F_Q$  can be limited since all other components remain relatively; fixed. The remaining part of the total power peaking factor can be derived from incore measurements, i.e., an effective radial peaking factor  $\bar{R}$ , can be determined as the ratio of the total peaking factor resulting from a full core flux map and the axial peaking factor in a selected thimble.

The limiting value of  $[F_j(Z)]_s$  is derived as follows:

$$[F_j(Z)]_s = \frac{[F_Q]^L \times [K(Z)]}{P_L \bar{R}_j (1 + \sigma_j) (1.03)(1.07)}$$

Where:

- a)  $F_j(Z)$  is the normalized axial power distribution from thimble j at elevation Z.