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U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

Subject: Technical Specification Change Request No. 294, Transmittal of Camera - Ready Technical Specification Pages (TAC No. MB2891)

> Oyster Creek Generating Station (Oyster Creek) Facility Operating License No. DPR-16 NRC Docket No. 50-219

This letter transmits the camera-ready Technical Specification pages to support NRC issuance of an amendment approving Oyster Creek Technical Specification Change Request No. 294.

If you have any questions or require additional information, please do not hesitate to contact us.

I declare under penalty of perjury that the foregoing is true and correct.

Very truly yours,

15-07-02

Executed On

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Michael P. Gallagher Director, Licensing & Regulatory Affairs Mid-Atlantic Regional Operating Group

Enclosure: Oyster Creek Technical Specification Revised Pages for Technical Specification Change Request No. 294

cc: H. J. Miller, USNRC, Regional Administrator, Region I
P. S. Tam, USNRC, Senior Project Manager, Oyster Creek
L. A. Dudes, USNRC, Senior Resident Inspector, Oyster Creek
File No. 01073

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ENCLOSURE

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Oyster Creek Technical Specification Revised Pages for Technical Specification Change Request No. 294

(Pages 2.1-1, 2.1-2, and 2.1-3)

SECTION 2

SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMIT - FUEL CLADDING INTEGRITY

Applicability: Applies to the interrelated variables associated with fuel thermal behavior.

<u>Objective:</u> To establish limits on the important thermal hydraulic variables to assure the integrity of the fuel cladding.

Specifications:

- A. When the reactor pressure is greater than or equal to 800 psia and the core flow is greater than or equal to 10% of rated, the existence of a minimum CRITICAL POWER RATIO (MCPR) less than 1.09 shall constitute violation of the fuel cladding integrity safety limit.
- B. When the reactor pressure is less than 800 psia or the core flow is less than 10% of rated, the core thermal power shall not exceed 25% of rated thermal power.
- C. In the event that reactor parameters exceed the limiting safety system settings in Specification 2.3 and a reactor scram is not initiated by the associated protective instrumentation, the reactor shall be brought to, and remain in, the COLD SHUTDOWN CONDITION until an analysis is performed to determine whether the safety limit established in Specification 2.1.A and 2.1.B was exceeded.
- D. During all modes of reactor operation with irradiated fuel in the reactor vessel, the water level shall not be less than 4'8" above the TOP OF ACTIVE FUEL.

Bases:

The fuel cladding integrity safety limit is set such that no fuel damage is calculated to occur if the limit is not violated. Since the parameters which result in fuel damage are not directly observable during reactor operation the thermal and hydraulic conditions resulting in a departure from nucleate boiling have been used to mark the beginning of the region where fuel damage could occur. Although it is recognized that a departure from nucleate boiling transition is calculated to occur has been adopted as a convenient limit. However, the uncertainties in monitoring the core operating state and in the procedure used to calculate the critical power result in an uncertainty in the value of the critical power. Therefore, the fuel cladding integrity safety limit is defined as the CRITICAL POWER RATIO in the limiting fuel assembly for which more than 99.9% of the fuel rods in the core are expected to avoid boiling transition considering the power distribution within the core and all uncertainties.

The Safety Limit MCPR is determined using the General Electric Thermal Analysis Basis, GETAB⁽¹⁾, which is a statistical model that combines all of the uncertainties in operating parameters and the procedures used to calculate critical power. The probability of the occurrence of boiling transition is determined using the General Electric Critical Quality (X) - Boiling Length (L), GEXL, correlation.

The use of the GEXL correlation is not valid for the critical power calculations at pressures below 800 psia or core flows less than 10% of rated. Therefore, the fuel cladding integrity safety limit is protected by limiting the core thermal power.

At pressures below 800 psia, the core elevation pressure drop (0 power, 0 flow) is greater than 4.56 psi. At low power and all flows this pressure differential is maintained in the bypass region of the core. Since the pressure drop in the bypass region is essentially all elevation head, the core pressure drop at low power and all flows will always be greater than 4.56 psi. Analyses show that with a flow of 28×10^3 lbs/hr bundle flow, bundle pressure drop is nearly independent of bundle power and has a value of 3.5 psi. Thus, bundle flow with a 4.56 psi driving head will be greater than 28×10^3 lbs/hr irrespective of total core flow and independent of bundle power for the range of bundle powers of concern. Full scale ATLAS test data taken at pressures from 14.7 psia to 800 psia indicate that the fuel assembly critical power at this flow is approximately 3.35 MWt. With the design peaking factors this corresponds to a core thermal power of more than 50%. Thus, a core thermal power limit of 25% for reactor pressures below 800 psi or core flow less than 10% is conservative.

Plant safety analyses have shown that the scrams caused by exceeding any safety setting will assure that the Safety Limit of Specification 2.1.A or 2.1.B will not be exceeded. Scram times are checked periodically to assure the insertion times are adequate. The thermal power transient resulting when a scram is accomplished other than by the expected scram signal (e.g., scram from neutron flux following closure of the main turbine stop valves) does not necessarily cause fuel damage. Specification 2.1.C requires that appropriate analysis be performed to verify that backup protective instrumentation has prevented exceeding the fuel cladding integrity safety limit prior to resumption of POWER OPERATION. The concept of not approaching a Safety Limit provided scram signals are OPERABLE is supported by the extensive plant safety analysis.

If reactor water level should drop below the TOP OF ACTIVE FUEL, the ability to cool the core is reduced. This reduction in core cooling capability could lead to elevated cladding temperatures and clad perforation. With a water level above the TOP OF ACTIVE FUEL, adequate cooling is maintained and the decay heat can easily be accommodated. It should be noted that during power generation there is no clearly defined water level inside the shroud and what actually exists is a mixture level. This mixture begins within the active fuel region and extends up through the moisture separators. For the purpose of this specification water level is defined to include mixture level during power operations.

The lowest point at which the water level can presently be monitored is 4'8" above the TOP OF ACTIVE FUEL. Although the lowest reactor water level limit which ensures adequate core cooling is the TOP OF ACTIVE FUEL, the safety limit has been conservatively established at 4'8" above the TOP OF ACTIVE FUEL.

REFERENCES

(1) NEDE-24011-P-A, General Electric Standard Application for Reactor Fuel (latest approved version as specified in the COLR)