

January 9, 2003

MEMORANDUM TO: Jared S. Wermiel, Chief
Reactor Systems Branch
Division of Systems Safety and Analysis, NRR

FROM: William D. Beckner, Program Director /RA/
Operating Reactor Improvements Program
Division of Regulatory Improvement Programs, NRR

SUBJECT: COMBUSTION ENGINEERING TECHNICAL SPECIFICATION 2.1.1.2 -
PEAK LINEAR HEAT RATE SAFETY LIMIT VIOLATIONS FOR THE
UNCONTROLLED CEA WITHDRAWAL FROM SUBCRITICAL (TAC
NO. MB3894)

By memorandum dated January 17, 2002, you identified a potential generic safety issue involving the interpretation of Technical Specifications for Combustion Engineering (CE) plants. Specifically, a number of CE plants have analyses that violate their peak linear heat rate (PLHR) safety limit when analyzing the uncontrolled CEA withdrawal from subcritical power and the uncontrolled CEA withdrawal from low power transients. The PLHR safety limit is defined as a measure to prevent fuel centerline temperatures from reaching the fuel melt temperature. The PLHR safety limit is specified in standard technical specifications (STS) 2.1.1.2.

The Technical Specifications Section (TSS) requested the CEOG assistance in resolving this issue. In response to our request, the Nuclear Energy Institute (NEI) Technical Specification Change Traveler, TSTF-445, "Revision to Peak Linear Heat Rate Safety Limit" was submitted to the staff for review. TSTF-445 proposed to replace STS Safety Limit 2.1.1.2, "Peak Linear Heat Rate" with a "Peak Fuel Centerline Temperature" Safety Limit. The proposed change was consistent with the Westinghouse and B&W improved Standard Technical Specifications with one modification which allows for adjustments for burnable poisons. TSTF-445 proposed to reference the approved methodology for the adjustments for burnable poisons in the TS 2.1.1.2 Bases.

By letter dated October, 21, 2002 (ADAMS Accession Number ML022950161), NEI was informed that the proposed location of the NRC approved methodology is not consistent with the recent TS amendments for Arkansas Nuclear One, Unit 2, dated March 4, 2002, (ADAMS Accession Number ML020640603), and Waterford Steam Electric Station dated March 5, 2002, (ADAMS Accession Number ML 020640587) and that TSTF-445 would have to be modified. After consulting with SRXB and OGC, we concluded that the NRC approved methodology for adjusting the burnable poisons should be listed in TS 2.1.1.2. Therefore, we have changed NUREG-1432, Rev. 2, accordingly. By letter dated December 23, 2002 (ADAMS Accession Number ML023570417), NEI was informed of our decision to modify the CE STS. This completes our review of the potential generic safety issue.

Please contact Kerri Kavanagh at 415-3743 or if you have any questions or need further information on these changes to the CE STS.

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Please contact Kerri Kavanagh at 415-3743 or if you have any questions or need further information on these changes to the CE STS.

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NAME	KAKavanagh	RLDennig	WDBeckner	
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