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January 13, 2003  
NOC-AE-03001449  
10CFR50.90

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
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South Texas Project  
Unit 1  
Docket No. STN 50-498  
Unit 1 Cycle 11 End of Life Moderator Temperature Coefficient Limit Report

Reference: Letter, J. J. Sheppard to U.S. Nuclear Regulatory Commission, "End of Life Moderator Temperature Coefficient," dated October 31, 2002 (NOC-AE-02001425)

As a condition for approval of the conditional elimination of the most negative end of life moderator temperature coefficient measurement technical specification change as stated in the referenced correspondence, STP committed to submit the following information for the first three uses of this methodology at STP:

1. A summary of the plant data used to confirm that the Benchmark Criteria of Table 3-2 of WCAP-13749-P-A, *Safety Evaluation Supporting the Conditional Elimination of the Most Negative EOL Moderator Temperature Coefficient Measurement*, have been met; and,
2. The Most Negative EOL Moderator Temperature Coefficient Limit Report (as found in Appendix D of WCAP-13749-P-A).

The information is attached. If there are any questions regarding this information, please contact Mr. Duane Gore at (361) 972-8909.

D.A. Leazar  
Manager,  
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Attachments:

1. Plant Data Used to Confirm Benchmark Requirements
2. Most Negative End of Life Moderator Temperature Coefficient Limit Report for South Texas Unit 1, Cycle 11

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**Attachment 1**

**Plant Data  
Used to Confirm Benchmark Requirements**

## Plant Data Used to Confirm Benchmark Requirements are Satisfied

This attachment presents a comparison of the South Texas Unit 1 Cycle 11 core characteristics with the requirements for use of the Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement Methodology and presents plant data that support that the Benchmark Criteria presented in WCAP-13749-P-A are met.

The Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement Methodology is described in WCAP-13749-P-A. This report was approved by the NRC with two requirements:

- only PHOENIX/ANC calculation methods are used for the individual plant analyses relevant to determinations for the EOL MTC plant methodology, and
- the predictive correction is reexamined if changes in core fuel designs or continued MTC calculation/measurement data show significant effect on the predictive correction.

The PHOENIX/ANC calculation methods were used for the South Texas Unit 1, Cycle 11, core design and relevant analyses. Also, the Unit 1, Cycle 11, core design does not represent a major change in core fuel design. Therefore, the Predictive Correction of  $-3$  pcm/ $^{\circ}$ F remains valid for this cycle. The Unit 1, Cycle 11, core meets both of the above requirements.

A description of the data collection and calculations required to complete the Table 3 Worksheet of the Most Negative Moderator Temperature Coefficient Limit Report is presented. Then the following data tables are provided:

- Table 1 - Benchmark Criteria for Application of the 300 ppm MTC Conditional Exemption Methodology (per WCAP-13749-P-A)
- Table 2 - Flux Map Data: Assembly Powers and Core Tilt Criteria
- Table 3 - Core Reactivity Balance Data
- Table 4 - Low Power Physics Test Data (Beginning of Cycle, Hot Zero Power): Isothermal Temperature Coefficient (ITC)
- Table 5 - Low Power Physics Test Data (Beginning of Cycle, Hot Zero Power): Individual Control Bank Worth

**Table 1**  
**Benchmark Criteria for Application of the 300 ppm MTC Conditional**  
**Exemption Methodology (per WCAP-13749-P-A)**

<u>Parameter</u>	<u>Criteria</u>
Assembly Power (Measured Normal Reaction Rate)	$\pm 0.1$ or 10 %
Measured Incore Quadrant Power Tilt (Low Power)	$\pm 4$ %
Measured Incore Quadrant Power Tilt (Full Power)	$\pm 2$ %
Core Reactivity (Cb) Difference	$\pm 1000$ pcm
BOL HZP ITC	$\pm 2$ pcm/ $^{\circ}$ F
Individual Control Bank Worth	$\pm 15$ % or $\pm 100$ pcm
Total Control Bank Worth	$\pm 10$ %

**Table 2**  
**Flux Map Data: Assembly Powers and Core Tilt Criteria**

Flux Map Number	Assembly Power			Measured Incore Quadrant Power Tilt		
	Measured to Predicted Error	Benchmark Criteria		Power Tilt	Benchmark Criteria	
		Requirement	Criteria Satisfied		Requirement	Criteria Satisfied
111001	% Diff	4.1	Yes	Max	1.0132	Yes
	Meas - Pred	0.049		Min	0.98164	
111002	% Diff	4.5	Yes	Max	1.00361	Yes
	Meas - Pred	0.048		Min	0.99612	
111003	% Diff	4.4	Yes	Max	1.00516	Yes
	Meas - Pred	0.051		Min	0.99206	
111004	% Diff	-3.9	Yes	Max	1.00509	Yes
	Meas - Pred	-0.047		Min	0.99206	
111005	% Diff	-3.7	Yes	Max	1.00385	Yes
	Meas - Pred	-0.045		Min	0.99293	
111006	% Diff	-3.4	Yes	Max	1.00403	Yes
	Meas - Pred	-0.043		Min	0.99458	
111007	% Diff	9.8	Yes	Max	1.00151	Yes
	Meas - Pred	-0.041		Min	0.99857	
111008	% Diff	9.6	Yes	Max	1.00122	Yes
	Meas - Pred	0.04		Min	0.99871	
111009	% Diff	10.1	Yes	Max	1.00173	Yes
	Meas - Pred	0.043		Min	0.99848	
111010	% Diff	10.3	Yes	Max	1.00787	Yes
	Meas - Pred	0.049		Min	0.99456	
111011	% Diff	10.2	Yes	Max	1.00258	Yes
	Meas - Pred	0.045		Min	0.99744	
111012	% Diff	11.4	Yes	Max	1.00191	Yes
	Meas - Pred	0.052		Min	0.99899	
111013	% Diff	11.6	Yes	Max	1.00049	Yes
	Meas - Pred	0.053		Min	0.99972	
111014	% Diff	7.1	Yes	Max	1.00352	Yes
	Meas - Pred	0.038		Min	0.99605	
111015	% Diff	7.7	Yes	Max	1.00287	Yes
	Meas - Pred	0.035		Min	0.99874	
111016	% Diff	7.1	Yes	Max	1.00639	Yes
	Meas - Pred	0.04		Min	0.99179	
111017	% Diff	7.6	Yes	Max	1.00767	Yes
	Meas - Pred	0.042		Min	0.98997	
111018	% Diff	7.5	Yes	Max	1.00704	Yes
	Meas - Pred	0.044		Min	0.98888	

% Diff within  
± 10%  
  
**OR**  
  
M-P within  
± 0.1

**Maps at < 90%  
Reactor Power**  
Max Power  
Tilt ≤ 1.04  
And  
Min Power  
Tilt ≥ 0.96  
  
**OR**  
  
**Maps at > 90%  
Reactor Power**  
Max Power  
Tilt ≤ 1.02  
And  
Min Power  
Tilt ≥ 0.98

**Table 3**  
**Core Reactivity Balance Data**

Surveillance Date/Time	Core Reactivity Difference (Critical boron)		
	Reactivity Deviation (pcm)	Benchmark Criteria	
		Requirement	Satisfied
10/30/01 16:58	69.3	Reactivity Deviation within $\pm 1000$ pcm	Yes
11/27/01 14:51	-75.6		Yes
12/18/01 15:39	-235.0		Yes
01/15/02 16:30	-275.2		Yes
02/13/02 14:35	-328.3		Yes
03/11/02 16:06	-335.4		Yes
04/10/02 16:03	-385.4		Yes
05/08/02 11:27	-408.7		Yes
06/03/02 15:47	-370.6		Yes
07/02/02 15:00	-331.5		Yes
07/30/02 16:13	-281.3		Yes
08/27/02 15:01	-265.3		Yes
09/24/02 16:06	-202.8		Yes
10/22/02 15:10	-172.0		Yes
11/27/02 15:23	-35.7	Yes	
12/17/02 14:17	-1.4	Yes	

**Table 4**  
**Low Power Physics Test Data**  
**(Beginning of Cycle, Hot Zero Power):**  
**Isothermal Temperature Coefficient (ITC)**

	Measured (pcm/°F)*	Predicted (pcm/°F)*	Error (Measured – Predicted) (pcm/°F)*	Benchmark Criteria	
				Requirement	Satisfied
BOC HZP ITC	-1.66	-2.35	0.69	ITC Error within ±2 pcm/°F	Yes

\*Note: 1 pcm = 1 x 10<sup>-5</sup> ΔK/K

**Table 5**  
**Low Power Physics Test Data**  
**(Beginning of Cycle, Hot Zero Power):**  
**Individual Control Bank Worth**

Bank	Measured (pcm)*	Predicted (pcm)*	Δ Error (pcm)*	% Error	Benchmark Criteria	
					Requirement	Satisfied
Shutdown Bank A	278.6	272.1	6.5	2.4%	% Error within ±15%  <b>OR</b>  Δ Error within ±100 pcm	Yes
Shutdown Bank B	799.6	775.3	24.3	3.1%		Yes
Shutdown Bank C	413.4	397.3	16.1	4.1%		Yes
Shutdown Bank D	398.7	389.6	9.1	2.3%		Yes
Shutdown Bank E	487.0	483.1	3.9	0.8%		Yes
Control Bank A	791.6	776.4	15.2	2.0%		Yes
Control Bank B	687.2	656.1	31.1	4.7%		Yes
Control Bank C	862.7	845.4	17.3	2.1%		Yes
Control Bank D	540.1	516.4	23.7	4.6%		Yes
Total Control Bank Worth	5258.9	5111.7	147.2	2.9%		% Error within ±10%

\*Note: 1 pcm = 1 x 10<sup>-5</sup> ΔK/K



**Attachment 2**

**Most Negative End of Life Moderator Temperature Coefficient  
Limit Report for South Texas Unit 1, Cycle 11**

## Most Negative End of Life Moderator Temperature Coefficient Limit Report for South Texas Unit 1, Cycle 11

(Measured 300 ppm Burnup, as per WCAP-13749-P-A, Appendix D)

### PURPOSE:

The purpose of this document is to present cycle-specific best estimate data for use in confirming the most negative end of life moderator temperature coefficient (MTC) limit in Technical Specification 3.1.1.3. This document also summarizes the methodology used for determining if a HFP 300 ppm MTC measurement is required.

### PRECAUTIONS AND LIMITATIONS:

The EOL MTC elimination data presented in this document apply to South Texas Unit 1 Cycle 11 only and may not be used for other operating cycles.

The following reference is applicable to this document:

Fetterman, R. J., Slagle, W. H., *Safety Evaluation Supporting the Conditional Exemption of the Most Negative EOL Moderator Temperature Coefficient Measurement*, WCAP-13749-P-A, March, 1997.

### PROCEDURE:

All core performance benchmark criteria listed in Table 1 must be met for the current operating cycle. These criteria are confirmed from startup physics test results and routine HFP boron concentration and flux map surveillance performed during the cycle.

If all core performance benchmark criteria are met, then the Revised Predicted MTC may be calculated per the algorithm given in Table 2. The required cycle specific data are provided in Table 2 and Figure 1. This methodology is also described in Reference 1. If all core performance benchmark criteria are met, and the Revised Predicted MTC is less negative than COLR Limit 2.3.3, then a measurement is not required.

Note that Figure 1 is not entirely linear. However, the deviation is slight enough that linear interpolation between adjacent points from the data at the bottom of the Figure is acceptable.

**Table 1**  
**Benchmark Criteria for Application of the 300 ppm MTC**  
**Conditional Exemption Methodology**

<u>Parameter</u>	<u>Criteria</u>
Assembly Power (Measured Normal Reaction Rate)	$\pm 0.1$ or 10 %
Measured Incore Quadrant Power Tilt (Low Power)	$\pm 4$ %
Measured Incore Quadrant Power Tilt (Full Power)	$\pm 2$ %
Core Reactivity (Cb) Difference	$\pm 1000$ pcm
BOL HZP ITC	$\pm 2$ pcm/ $^{\circ}$ F
Individual Control Bank Worth	$\pm 15$ % or $\pm 100$ pcm
Total Control Bank Worth	$\pm 10$ %

**Table 2**  
**Algorithm for Determining the Revised Predicted Near-EOL 300 ppm MTC**

The Revised Predicted MTC = Predicted MTC + AFD Correction – 3 pcm/°F  
where:

Predicted MTC is calculated from Figure 1 at the burnup corresponding to the measurement of 300 ppm at RTP conditions,

AFD Correction is the more negative value of:

$$\{ 0 \text{ pcm/}^\circ\text{F}, ( \Delta\text{AFD} * \text{AFD Sensitivity} ) \}$$

$\Delta\text{AFD}$  is the measured AFD minus the predicted AFD from an incore flux map taken at or near the burnup corresponding to 300 ppm.

$$\text{AFD Sensitivity} = 0.05 \text{ pcm} / ^\circ\text{F} / \Delta\text{AFD}$$

Predictive Correction is –3 pcm/°F, as included in the equation for the Revised Predicted MTC.

**Table 3**  
**Worksheet for Calculating the Predicted Near-EOL 300 ppm MTC**

Unit: 1, Cycle 11      Date: 12/17/2002      Time: 1525

**Reference for Cycle-Specific MTC Data:**

Letter from T.D. Croyle, Westinghouse, to D.F. Hoppes, STPNOC, [STPEGS] Unit 1 Cycle 11 Most Negative Moderator Temperature Coefficient Limit Report, dated 19 Nov 2002, ST-UB-NOC-02002311.

**Part A. Predicted MTC**

- |     |   |                |         |
|-----|---|----------------|---------|
| A.1 | Cycle Average Burnup Corresponding to the HFP ARO equilibrium xenon $C_B$ of 300 ppm. | <u>15171.8</u> | MWD/MTU |
| A.2 | Predicted HFP ARO MTC corresponding to burnup (A.1)                                   | <u>-34.96</u>  | pcm/°F  |

**Part B. AFD Correction**

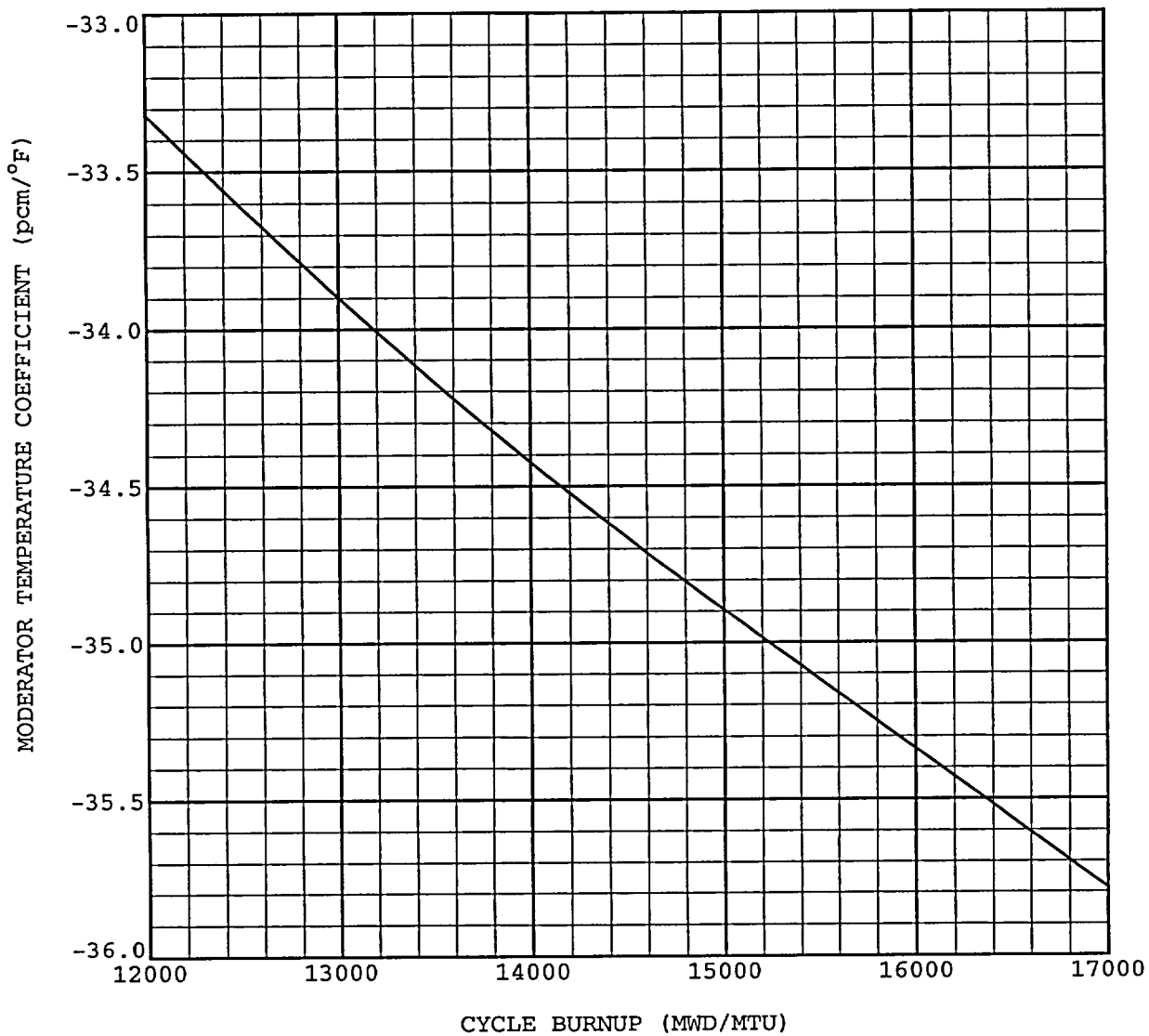
- |     |   |                |             |
|-----|---|----------------|-------------|
| B.1 | Burnup of most recent HFP, equilibrium conditions incore flux map   | <u>15200.9</u> | MWD/MTU     |
| B.2 | Measured HFP AFD at burnup (B.1)<br>Reference incore flux map:<br>ID: <u>111018</u> Date: <u>12/17/02</u> | <u>-2.02</u>   | % AFD       |
| B.3 | Predicted HFP AFD at burnup (B.1)   | <u>-3.07</u>   | % AFD       |
| B.4 | MTC Sensitivity to AFD  | <u>0.05</u>    | pcm/°F/ΔAFD |
| B.5 | AFD Correction, more negative of { 0 pcm/°F, B.4 *(B.2 - B.3)}  | <u>0</u>       | pcm/°F      |

**Part C. Revised Prediction**

- |     |                                    |               |        |
|-----|------------------------------------|---------------|--------|
| C.1 | Revised Prediction (A.2 + B.5 - 3) | <u>-37.96</u> | pcm/°F |
| C.2 | Surveillance Limit (COLR 2.3.3)    | <u>-53.6</u>  | pcm/°F |

If C.1 is less negative than C.2, then the HFP 300 ppm MTC measurement is not required per Specification 4.1.1.3.

**Figure 1**  
**Predicted HFP FOP 300 ppm MTC vs. Cycle 11 Burnup**



Cycle Burnup (MWD/MTU)	Moderator Temperature Coefficients (pcm/°F)
12000	-33.32
14000	-34.43
16000	-35.34
17000	-35.79

**Table 4**  
**Data Collection and Calculations Required to Complete the Table 3 Worksheet**  
**of the Most Negative Moderator Temperature Coefficient Limit Report**

Data at the 300 ppm Boron Point

- RCS Boron at 300 ppm at 14:24 on 12/16/02.
- Burnup at 300 ppm: 15171.8 MWD/MTU (A.1)
- Predicted MTC: -34.96 pcm/°F (A.2)

Data from Last Flux Map:

- Flux Map Number: 111018 (B.2)
- Reactor Power 100% RTP  
*Note: The monthly flux map was performed at about the same time the unit reached the 300 ppm concentration value. Data from this flux map was used for the AFD Correction.*
- Burnup 15200.9 MWD/MTU (B.1)
- Measured Axial Offset (MAO): -2.02% (B.2)  
*Note: The Westinghouse BEACON computer code (similar to the Westinghouse INCORE code) determines Axial Offset (AO), not Axial Flux Difference (AFD). Therefore, the AO must be converted to AFD before use. The relationship between AO and AFD is*

$$AFD = \text{Axial Offset} * \text{Fractional Power}$$

- Axial Flux Difference

Lower Predicted AO (LPAO): -2.91% at 14000 MWD/MTU  
Higher Predicted AO (HPAO): -3.17% at 16000 MWD/MTU  
Predicted AO (PAO) =

$$PAO = \frac{B/U_{@ \text{Measured AO}} - B/U_{@ \text{Lower Predicted AO}}}{B/U_{@ \text{Higher Predicted AO}} - B/U_{@ \text{Lower Predicted AO}}} \times (HPAO - LPAO) + LPAO$$

$$PAO = (15200.9 - 14000)/(16000 - 14000) * (-3.17\% + 2.91\%) - 2.91\% = -3.07\% \text{ (B.3)}$$

$$\begin{aligned} \Delta AFD &= (MAO - PAO) * 100\% \\ &= (-2.02\% + 3.07\%) * 100\% \\ &= 1.05\% \end{aligned}$$

**Table 4 (cont.)**  
**Data Collection and Calculations Required to Complete the Table 3 Worksheet**  
**of the Most Negative Moderator Temperature Coefficient Limit Report**

Determination of the Revised Predicted Moderator Temperature Coefficient (MTC)

AFD Sensitivity: 0.05 pcm/°F/ ΔAFD

AFD Correction: 0 pcm/°F (B.5)

where: AFD Correction is the more negative of the following:

0 pcm/°F or (ΔAFD \* AFD Sensitivity)

0 pcm/°F or (1.05% \* 0.05 pcm/°F/ ΔAFD)

0 pcm/°F or 0.053 pcm/°F

∴ 0 pcm/°F

$$\begin{aligned}\text{Revised Predicted MTC} &= \text{Predicted MTC} + \text{AFD Correction} - 3 \text{ pcm/°F} \\ &= -34.96 \text{ pcm/°F} + 0.0 \text{ pcm/°F} - 3 \text{ pcm/°F} \\ &= -37.96 \text{ pcm/°F (C.1)}\end{aligned}$$