



Serial: RNP-RA/07-0005

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United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

TRANSMITTAL OF CORE OPERATING LIMITS REPORT

Ladies and Gentlemen:

In accordance with Technical Specifications 5.6.5.d, Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc., is transmitting Revision 1 to the H. B. Robinson Steam Electric Plant, Unit No. 2, Core Operating Limits Report (COLR) for Cycle 24. A summary of the changes is provided on Page 2 of the attached revision to FMP-001, "Core Operating Limits Report (COLR)." The COLR is Attachment 10.1 to FMP-001.

There are no commitments associated with this letter.

If you have any questions concerning this matter, please contact me at (843) 857-1253.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. T. Baucom'.

C. T. Baucom
Supervisor – Licensing/Regulatory Programs

RAC/rac

Attachment

c: Dr. W. D. Travers, NRC, Region II
NRC Resident Inspector, HBRSEP
C. P. Patel, NRC, NRR

United States Nuclear Regulatory Commission
Attachment to Serial: RNP-RA/07-0005
23 pages including cover page

H. B. ROBINSON STEAM ELECTRIC PLANT (HBRSEP), UNIT NO. 2

CYCLE 24 CORE OPERATING LIMITS REPORT, REVISION 1

Note: This report is Attachment 10.1 to HBRSEP, Unit No. 2,
Fuel Management Procedure (FMP) - 001

H. B. ROBINSON NUCLEAR PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 6
PART 5

FUEL MANAGEMENT PROCEDURE

FMP-001

CORE OPERATING LIMITS REPORT (COLR)

REVISION 21

**SUMMARY OF CHANGES
PRR 216077**

REVISION #	REVISION COMMENTS
21	<p>Per EC 65405</p> <p>Added reference 2.13, EC 65405</p> <p>Added reference 2.14, License Amendment 209</p> <p>Added reference 2.15, License Amendment 211</p> <p>Step 10.1, changed to Revision 1 of the COLR</p> <p>Attachment 10.1:</p> <ol style="list-style-type: none"> 1) Above Section 1.0, changed the title to reflect Revision 1 of the COLR. 2) Section 1.0, added EC 65405 to discussion. 3) Section 1.0, Methodology Table, added methodology reference 25 to row representing MTC. 4) Revised step 2.1.1.c to reflect the new Negative MTC limit of -45.0 pcm/°F. 5) Revised step 2.1.2 to reflect the new 300 ppm surveillance limit of -37.49 pcm/°F. 6) Revised step 2.1.3 to reflect the new 60 ppm surveillance limit of -41.68 pcm/°F. 7) Added step 3.24, not used for Cycle 24. 8) Added step 3.25, to identify the S-RELAP5 methodology approved for use at HB Robinson. EMF-2310(P)(A) Revision 1, SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors, May 2004, (S-RELAP5, Non-LOCA Methodology).

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1.0 PURPOSE

- 1.1 To present the cycle-specific Core Operating Limits Report (COLR) for HBRSEP Unit No. 2
- 1.2 To provide a means of incorporating the COLR into the Plant Operating Manual (POM). The COLR is placed in the POM to ensure that it resides in a controlled location, and that references are provided that ensure that the requirements specified in NRC Generic Letter 88-16 and Improved Technical Specification 5.6.5 are met.

2.0 REFERENCES

- 2.1 Improved Technical Specifications 1.1, 3.1.1, 3.1.3, 3.1.5, 3.1.6, 3.2.1, 3.2.2, 3.2.3, 3.4.5, 3.4.6, 3.9.1, and 5.6.5
- 2.2 PLP-100, Technical Requirements Manual (TRM)
- 2.3 NRC Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications," October 4, 1988.
- 2.4 License Amendment No. 141 - Regarding Removal of Cycle-Specific Parameter Limits to Core Operating Limits Report
- 2.5 EC 58475, R2C24 Reload Core Design and Safety Analysis
- 2.6 PRO-NGGC-0204, Procedure Review and Approval
- 2.7 PLP-001, Plant Nuclear Safety Committee (PNSC)
- 2.8 REG-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews
- 2.9 Self Assessment # 108207, Technical Specifications 5.0, "Administrative Controls
- 2.10 UFSAR Section 17.3, RNP Quality Assurance Program Description
- 2.11 Calculation RNP-F/NFSA-0114, "RNP Cycle 24 COLR Update"
- 2.12 NFP-NGGC-0018, Core Operating Limits Report Generation for HNP, RNP, and CR3
- 2.13 EC 65405, Revision of RNP EOL MTC Limit

2.14 License Amendment No. 209 - Regarding Methodology for Large Break LOCA Analyses

2.15 License Amendment No. 211 - Regarding Core Operating Limits Report References

3.0 RESPONSIBILITIES

3.1 RES Reactor Systems and/or the Nuclear Fuels Management and Safety Analysis Section (NFM&SA) is responsible for revising this procedure as changes to the COLR are required. At a minimum, revisions are required once per cycle, at Beginning of Cycle, to make the COLR cycle-specific.

3.2 The Plant Nuclear Safety Committee (PNSC) is responsible for reviewing revisions to the COLR and providing concurrence prior to implementation of COLR revisions (UFSAR Section 17.3, RNP Quality Assurance Program Description, Appendix A Item A.1.6.6.j).

3.3 RES Reactor Systems and Operations are responsible for monitoring plant conditions to ensure the Core Operating Limits specified in this procedure are met.

3.4 Licensing/Regulatory Programs is responsible for providing prompt notification of COLR revisions to the NRC in accordance with ITS 5.6.5.d within 30 days upon procedure approval.

4.0 PREREQUITES

4.1 None.

5.0 PRECAUTIONS and LIMITATIONS

5.1 Requirements for Revision of the COLR

5.1.1 The COLR is cycle-specific, this procedure will be revised at least once per cycle, that is, at the beginning of the cycle.

5.1.2 The methods and requirements established by this procedure for revision of the COLR supplement those of PRO-NGGC-0204.

5.1.3 Changes to the COLR will require a 10CFR 50.59 Evaluation as well as PNSC concurrence and notification of the NRC per TS 5.6.5.d as part of the revision process.

5.2 Core Operating Limits Report (COLR)

5.2.1 The current cycle-specific Core Operating Limits Report is provided in ATTACHMENT 10.1.

6.0 **SPECIAL TOOLS and EQUIPMENT**

6.1 None.

7.0 **ACCEPTANCE CRITERIA**

7.1 None.

8.0 **PROCEDURE**

8.1 Definitions

8.1.1 $F_Q^V(Z)$ - the Heat Flux Hot Channel Factor is the maximum local heat flux on the surface of a fuel rod divided by the average fuel rod heat flux and including the $V(z)$ penalty and measurement uncertainties.

8.1.2 $CFQ = F_Q^{RTP}$ - the cycle-specific F_Q limit at Rated Thermal Power (RTP).

8.1.3 $K(Z)$ - the normalized axial dependence factor for F_Q versus core elevation.

8.1.4 $F_{\Delta H}^N$ - the Nuclear Enthalpy Rise Hot Channel Factor is the integral of linear power along the rod with the highest integrated power divided by the average rod power.

8.1.5 $F_{\Delta H}^{RTP}$ - the cycle-specific $F_{\Delta H}$ limit at Rated Thermal Power (RTP).

8.1.6 $PF_{\Delta H}$ - the Power Factor Multiplier for $F_{\Delta H}$.

8.1.7 AFD - the Axial Flux Difference is the difference in normalized flux signals between the top and bottom halves of a two-section excore neutron detector.

8.1.8 $V(Z)$ - the ratio of the maximum $F_Q(Z)$ produced during and following transient maneuvers to the equilibrium $F_Q(Z)$ value at target axial offset conditions.

8.1.9 P - the fraction of rated power (2339 MWt) at which the core is operating.

8.1.10 RTP - Rated Thermal Power is a total reactor core heat transfer rate to the reactor coolant of 2339 MWt.

8.2 Abbreviations

- 8.2.1 POM - Plant Operating Manual
- 8.2.2 PNSC - Plant Nuclear Safety Committee
- 8.2.3 COLR - Core Operating Limits Report
- 8.2.4 MTC - Moderator Temperature Coefficient
- 8.2.5 ITS - Improved Technical Specifications
- 8.2.6 RIL - Rod Insertion Limits
- 8.2.7 EFPD - Effective Full Power Day

8.3 Background Information

- 8.3.1 HBRSEP Unit No. 2, like all other commercial nuclear power plants, is required to operate within the specific core operating limits and restrictions as specified in the Technical Specifications. Examples of these limits/restrictions include power dependent rod insertion limits, and limits of $F_Q(Z)$ and $F_{\Delta H}$, among others. Technical Specification changes and NRC approval were required as specific numerical values for these limits/restrictions were revised. If these changes were frequent, e.g. on a cycle-specific basis, or if they were needed on accelerated schedules, considerable administrative burdens were placed on both the NRC and on utility personnel.
- 8.3.2 To reduce this burden, the COLR concept was developed in which specific numerical values for certain core operating limits and/or restrictions would be removed from the Technical Specifications and relocated to a COLR document. Using NRC approved methodologies, numerical values for these operating limits and/or restrictions can be updated on an as-needed basis (e.g. each cycle) by simply revising the COLR with appropriate review and notification to the NRC, hence, revisions to the Technical Specifications are not required.
- 8.3.3 The NRC endorsed the COLR concept by encouraging licensees to develop such a document in Generic Letter 88-16 which provided guidance for relocation of specific numerical values for various core operating limits and/or restrictions to a COLR and indicated that these values could be changed without prior NRC approval so long as an NRC-approved methodology is followed. Future changes and updates would be allowable provided an Evaluation is performed in accordance with the provisions of 10CFR 50.59, the COLR is suitably revised, and the NRC is promptly informed of the revision.

8.3.4 The use of a COLR at H. B. Robinson was accepted by the NRC per License Amendment 141. The amendment established requirements for a cycle-specific COLR and for notification of the NRC (ITS 5.6.5.d) when any revisions or supplements (beginning of cycle or midcycle) are made. Since the COLR is cycle-specific, the COLR will be revised at least once per cycle, that is, at the beginning of the cycle.

8.4 Contents of the H.B. Robinson Unit 2 COLR

8.4.1 Technical Specification ITS 5.6.5.a requires the following cycle-specific core operating limits be established and documented in the Core Operating Limits Reports

1. Moderator Temperature Coefficient (MTC) Limits
2. Shutdown Bank Insertion Limits
3. Control Bank Insertion Limits
4. Heat Flux Hot Channel Factor ($F_Q(Z)$) Limit, CFQ
5. $K(Z)$ Curve
6. Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$) Limit, $F_{\Delta H}^{RTP}$
7. $F_{\Delta H}$ Power Factor Multiplier ($PF_{\Delta H}$)
8. Axial Flux Difference (AFD) Limits
9. $V(Z)$ Curve(s)
10. Shutdown Margin
11. Refueling Boron Concentration

8.4.2 The COLR will also contain a listing of the specific methodologies used to support the core operating limits per TS 5.6.5.b.

8.4.3 The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met (TS 5.6.5.c).

8.5 Revisions to The COLR

8.5.1 Nuclear Fuels Management & Safety Analysis Section (NFM&SA) shall review and recommend for implementation any changes to the COLR.

The review is normally documented in an EC including any required Owner's Reviews, calculations and other reviews. The use of NRC approved methodologies is also confirmed in the EC. Changes recommended by NFM&SA are normally transmitted to the plant via a memo recommending the revision of the COLR.

- 8.5.2 Once NFM&SA recommends a revision to the COLR, a Reactor Engineer shall prepare a revision to FMP-001 in accordance with the requirements of PRO-NGGC-0204.
- 8.5.3 Other plant procedures shall be reviewed to determine if they require revision in order to implement the revised COLR. At a minimum, the procedures listed in ATTACHMENT 10.2 shall be reviewed.
- 8.5.4 Any required procedure revisions or new procedures necessary to incorporate the change to the COLR shall be completed by the effective date of the COLR change.
- 8.5.5 The proposed revision of the COLR shall be submitted to the PNSC for review.
- 8.5.6 The PNSC shall review the proposed revision to the COLR and concur with the changes prior to their implementation in accordance with UFSAR Section 17.3 Appendix A Item A.1.6.6.j.
- 8.5.7 Upon approval of the COLR revision, Licensing/Regulatory Programs shall notify the NRC per ITS 5.6.5.d within 30 days.

9.0 **RECORDS**

- 9.1 This procedure does not generate any records.

10.0 **ATTACHMENTS**

- 10.1 HBRSEP Unit No. 2 Cycle 24 Core Operating Limits Report, Revision 1
- 10.2 Procedures Potentially Affected By COLR Revisions

ATTACHMENT 10.1
Page 1 of 12
HBRSEP UNIT NO. 2, CYCLE 24
CORE OPERATING LIMITS REPORT
REVISION 1

1.0 OPERATING LIMITS REPORT

This Core Operating Limits Report (COLR) for HBRSEP Unit No. 2, Cycle 24 has been prepared per EC 58475, and EC 65405 in accordance with the requirements of ITS 5.6.5.

The Improved Technical Specifications affected by this report and the methodologies used for the various parameters are listed below.

Parameter	ITS Reference	Applicable Methodology (Section 3.0 Number)
MTC	3.1.3	1, 2, 4, 15, 18, 19, 22, 25
Shutdown Bank RILs	3.1.5	1, 2, 4, 8, 15, 18, 19, 22
Control Bank RILs	3.1.6	1, 2, 4, 8, 15, 18, 19, 22
$F_Q^V(Z)$	3.2.1, 3.2.3	1, 2, 5, 6, 7, 8, 11, 12, 13, 14, 15, 17, 18, 19, 21, 22
$F_{\Delta H}$	3.2.2, 3.2.3	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22
AFD	3.2.1, 3.2.3	1, 2, 6, 7, 12, 13, 14, 15, 16, 18, 19, 21, 22
Shutdown Margin Requirements	3.1.1, 3.4.5, 3.4.6	1, 2, 4, 8, 15, 18, 19, 22
Refueling Boron Requirements	3.9.1	1, 2, 4, 8, 18, 19, 22
COLR	5.6.5	None

ATTACHMENT 10.1
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HBRSEP UNIT NO. 2, CYCLE 24
CORE OPERATING LIMITS REPORT
REVISION 1

2.0 OPERATING LIMITS

The cycle-specific parameter limits for the specifications listed in Section 1.0 are presented in the following subsections. These limits have been developed using the NRC-approved methodologies specified in ITS 5.6.5 and the COLR Section 3.0.

2.1 Moderator Temperature Coefficient (ITS 3.1.3)

2.1.1 The Moderator Temperature Coefficient (MTC) limits are:

- a) The Positive MTC (ARO) shall be less than or equal to +5.0 pcm/°F for power levels up to 50% RTP, and
- b) The Positive MTC (ARO) shall be less than or equal to 0.0 pcm/°F at 50% RTP and above.
- c) The Negative MTC (ARO/RTP) shall be less negative than -45.0 pcm/°F.

2.1.2 The 300 ppm Surveillance limit is:

At an equilibrium RTP-ARO boron concentration of 300 ppm the MTC shall be less negative than or equal to -37.49 pcm/°F.

2.1.3 The 60 ppm Surveillance limit is:

At an equilibrium RTP-ARO boron concentration of 60 ppm the MTC shall be less negative than or equal to -41.68 pcm/°F.

2.2 Shutdown Banks Insertion Limits (ITS 3.1.5)

2.2.1 The shutdown banks shall be withdrawn to at least 225 steps.

2.3 Control Bank Insertion Limits (ITS 3.1.6)

2.3.1 The control banks shall be limited in physical insertion as shown in Figure 1.0

ATTACHMENT 10.1
Page 3 of 12
HBRSEP UNIT NO. 2, CYCLE 24
CORE OPERATING LIMITS REPORT
REVISION 1

2.4 Heat Flux Hot Channel Factor - $F_Q^V(Z)$ (ITS 3.2.1, 3.2.3)

$$F_Q^V(Z) \leq (CFQ/P) \times K(Z) \text{ for } P > 0.5$$

$$F_Q^V(Z) < (CFQ/0.5) \times K(Z) \text{ for } P \leq 0.5$$

Where: $P = (\text{Thermal Power} / \text{Rated Thermal Power})$

2.4.1 $CFQ = 2.46$ for ROB-14, ROB-16, ROB-17, ROB-18, ROB-19, ROB-20 and ROB2-24 reload batches

2.4.2 $K(Z)$ is specified in Figure 2.0

2.5 Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}$ (ITS 3.2.2, 3.2.3)

$$F_{\Delta H} < F_{\Delta H}^{RTP} (1 + PF_{\Delta H} (1-P))$$

Where: $P = (\text{Thermal Power} / \text{Rated Thermal Power})$

2.5.1 $F_{\Delta H}$ is the measured $F_{\Delta H}^N$ multiplied by the measurement uncertainty (1.04)

2.5.2 $F_{\Delta H}^{RTP} = 1.80$ for ROB-14, ROB-16, ROB-17, ROB-18, ROB-19, ROB-20 and ROB2-24 reload batches

2.5.3 $PF_{\Delta H} = 0.2$

2.6 Axial Flux Difference (ITS 3.2.1, 3.2.3)

2.6.1 The axial flux difference target bands are $\pm 3\%$ and $\pm 5\%$ about the target AFD.

2.6.2 $V(Z)$ values for the $\pm 3\%$ and $\pm 5\%$ target bands are specified in Figures 3.1 and 3.2

2.6.3 The AFD Acceptable Operation Limits are specified in Figure 4.0

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CORE OPERATING LIMITS REPORT
REVISION 1

2.7 Shutdown Margin Requirements (SDM) (ITS 3.1.1, 3.1.4, 3.1.5, 3.1.6, 3.1.8, 3.4.5, 3.4.6, 3.9.1)

2.7.1 The Mode 1 and Mode 2 required SDM versus RCS boron concentration is presented in Figure 5.0.

2.7.2 The Mode 3 SDM requirements are as follows:

- a) With at least 2 reactor coolant pumps in operation, the SDM shall be greater than or equal to that specified in Figure 5.0.
- b) With less than 2 reactor coolant pumps in operation and the rod control system capable of rod withdrawal, the SDM shall be greater than or equal to 4% $\Delta k/k$.
- c) With less than 2 reactor coolant pumps in operation and with the rod control system not capable of rod withdrawal, the SDM shall be greater than or equal to that specified in Figure 5.0.

2.7.3 The Mode 4 SDM requirements are as follows:

- a) With at least 2 reactor coolant pumps in operation, the SDM shall be greater than or equal to that specified in Figure 5.0.
- b) With less than 2 reactor coolant pumps in operation and the rod control system capable of rod withdrawal, the SDM shall be greater than or equal to 4% $\Delta k/k$.
- c) With less than 2 reactor coolant pumps in operation and with the rod control system not capable of rod withdrawal, the SDM shall be greater than or equal to that specified in Figure 5.0.

2.7.4 The minimum required SDM for Mode 5 is 1% $\Delta k/k$.

2.7.5 The minimum required SDM for Mode 6 is 6% $\Delta k/k$.

2.8 Refueling Boron Concentration (ITS 3.9.1)

2.8.1 In Mode 6 the minimum boron concentration shall be 1950 ppm.

ATTACHMENT 10.1
Page 5 of 12
HBRSEP UNIT NO. 2, CYCLE 24
CORE OPERATING LIMITS REPORT
REVISION 1

3.0 METHODOLOGY REFERENCES

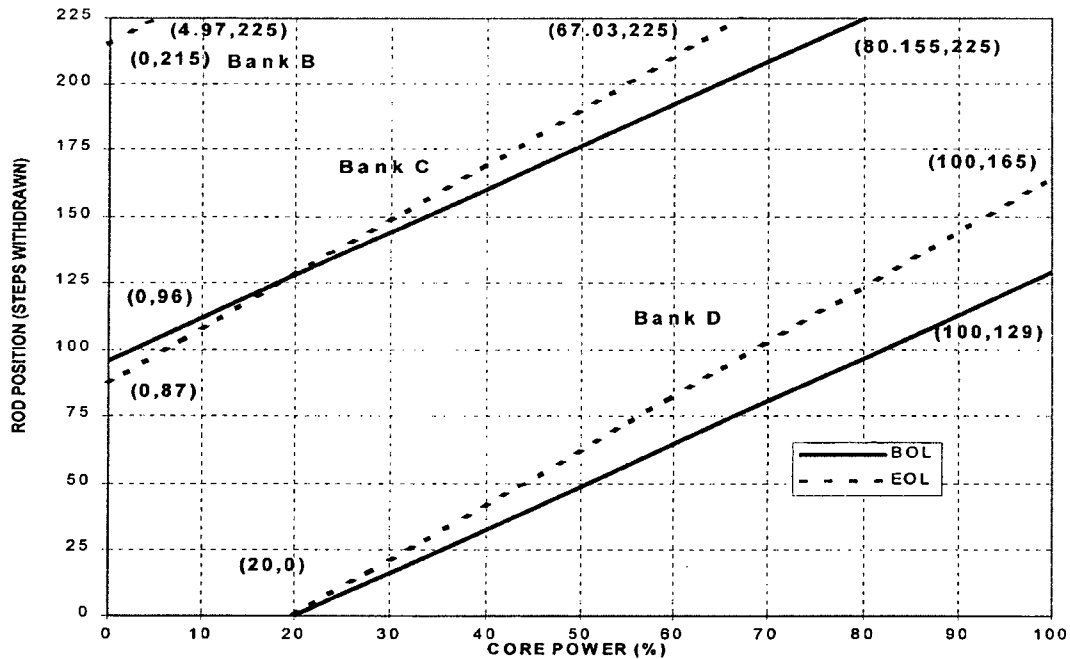
- 1) Not Used For Cycle 24
- 2) XN-NF-84-73(A), Revision 5, "Exxon Nuclear Methodology For PWRs: Analysis of Chapter 15 Events," Siemens Power Corporation, October 1990.
- 3) XN-NF-82-21(A), Revision 1, "Application of Exxon Nuclear Company PWR Thermal Margin Methodology to Mixed Core Configurations," Exxon Nuclear Company, September 1983.
- 4) EMF-84-093(A), Revision 1, "Steamline Break Methodology for PWRs," Siemens Power Corporation, February 1999.
- 5) XN-75-32(A) Supplements 1, 2, 3, and 4, "Computational Procedure for Evaluating Fuel Rod Bow," Exxon Nuclear Company, October 1983.
- 6) XN-NF-82-49(A), Revision 1 (April 1989) and Supplement 1 (December 1994), "Exxon Nuclear Company Evaluation Model Revised EXEM PWR Small Break Model," Siemens Power Corporation.
- 7) EMF-2087(A), "SEM/PWR-98: ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation, June 1999.
- 8) XN-NF-78-44(A), "A Generic Analysis of the Control Rod Ejection Transient for Pressurized Water Reactors," Exxon Nuclear Company, October 1983
- 9) Not Used For Cycle 24
- 10) Not Used For Cycle 24
- 11) XN-NF-82-06(A), Revision 1 and Supplements 2, 4, and 5, "Qualification of Exxon Nuclear Fuel for Extended Burnup (PWR)," Exxon Nuclear Company, October 1986.
- 12) Not Used For Cycle 24

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CORE OPERATING LIMITS REPORT
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- 13) Not Used For Cycle 24
- 14) Not Used For Cycle 24
- 15) Not Used For Cycle 24
- 16) ANF-88-054(A), "PDC-3: Advanced Nuclear Fuels Corporation Power Distribution Control for Pressurized Water Reactors and Application of PDC-3 to H.B. Robinson Unit 2," Advanced Nuclear Fuels Corporation, October 1990.
- 17) ANF-88-133(A), and Supplement 1, "Qualification of Advanced Nuclear Fuels PWR Design Methodology for Rod Burnups of 62 GWd/MTU," Advanced Nuclear Fuels Corporation, December 1991.
- 18) ANF-89-151(A), and correspondence "ANF-RELAP Methodology for Pressurized Water Reactors: Analysis of Non-LOCA Chapter 15 Events," Advanced Nuclear Fuels Corporation, May 1992.
- 19) EMF-92-081(A), Revision 1, "Statistical Setpoint/Transient Methodology for Westinghouse Type Reactors," Siemens Power Corporation, February 2000.
- 20) EMF-92-153(A) and Supplement 1, Revision 1, "HTP: Departure from Nucleate Boiling Correlation for High Thermal Performance Fuel," Siemens Power Corporation, January 2005.
- 21) XN-NF-85-92(A), "Exxon Nuclear Uranium Dioxide/Gadolinia Irradiation Examination and Thermal Conductivity Results," Exxon Nuclear Company, November 1986.
- 22) EMF-96-029(A), Volume 1, Volume 2 and Attachment, "Reactor Analysis System for PWRs," Siemens Power Corporation, January 1997.
- 23) EMF-92-116(A), "Generic Mechanical Design Criteria for PWR Fuel Designs," Siemens Power Corporation, February 1999.
- 24) Not Used For Cycle 24
- 25) EMF-2310(P)(A) Revision 1, SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors, May 2004, (S-RELAP5, Non-LOCA Methodology).

ATTACHMENT 10.1
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HBRSEP UNIT NO. 2, CYCLE 24
CORE OPERATING LIMITS REPORT
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Figure 1.0, Control Group Insertion Limits for Three Loop Operation



NOTE: The breakpoint between BOL and EOL RIL occurs at 50% of the cycle as defined by burnup. For Cycle 24, this burnup occurs at 257 EFPDs (9000 MWD/MTU).

Control rod banks shall always be withdrawn and inserted in the prescribed sequence. For withdrawal, the sequence is Control "A", Control "B", Control "C", and Control "D". The insertion sequence is the reverse of the withdrawal sequence.

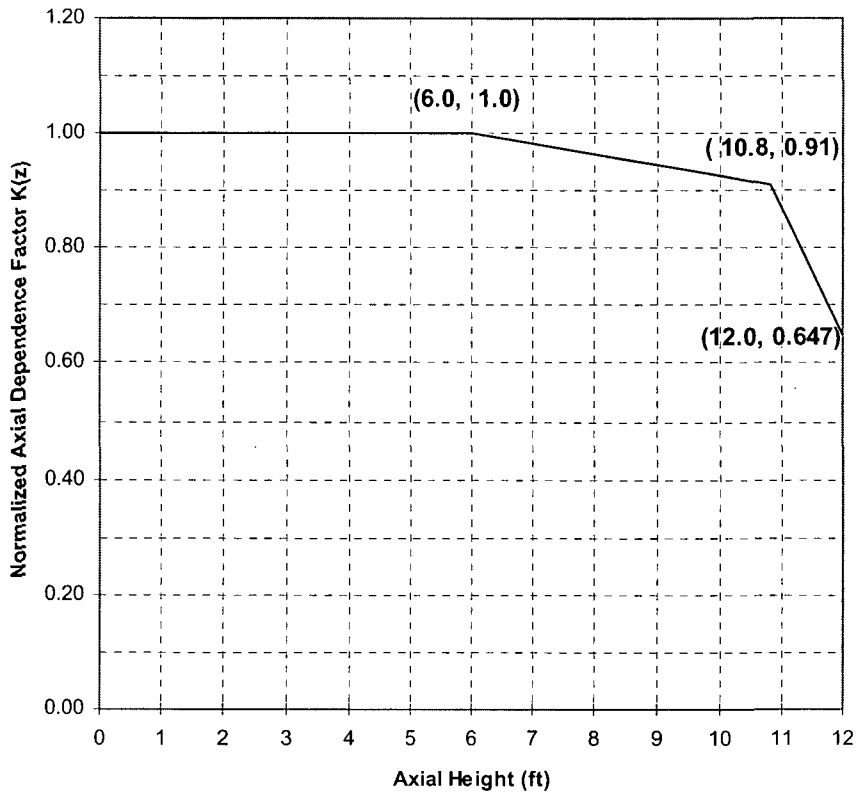
Overlap of consecutive control banks shall not exceed the prescribed setpoint for automatic overlap. The setpoint is 97 steps.

Control bank A must be withdrawn from the core prior to power operation.

At BOL and 0% core power, Control bank B will be at or above step 224.

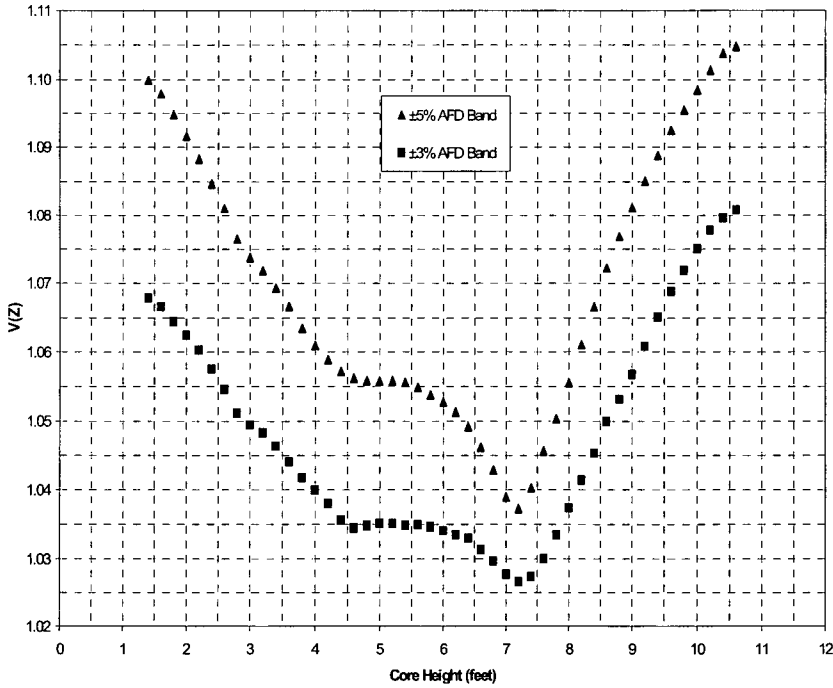
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Figure 2.0, Normalized Axial Dependence Factor $K(z)$ for F_q Versus Elevation



NOTE: For power levels below 32% RTP, the $K(z)$ at all axial levels is 1.0. It is conservative to apply the above figure to power levels below 32% RTP.

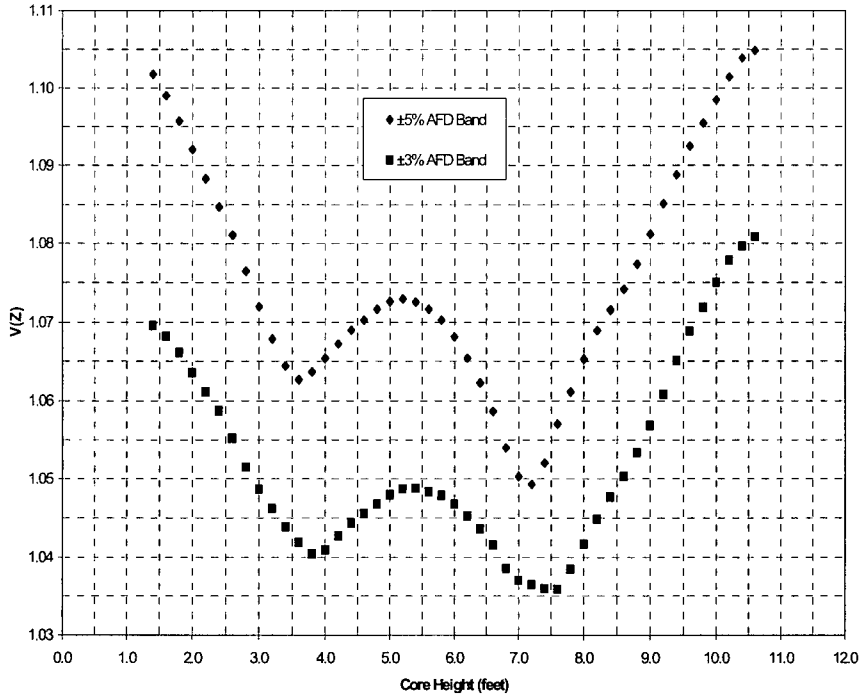
ATTACHMENT 10.1
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CORE OPERATING LIMITS REPORT REVISION 1
Figure 3.1 V(z) as a Function of Core Height



Height (Feet)	±5% V(Z)	±3% V(Z)
*0.0	1.0000	1.0000
*0.2	1.0000	1.0000
*0.4	1.0000	1.0000
*0.6	1.0000	1.0000
*0.8	1.0000	1.0000
*1.0	1.0000	1.0000
*1.2	1.0000	1.0000
1.4	1.0999	1.0679
1.6	1.0979	1.0666
1.8	1.0948	1.0644
2.0	1.0916	1.0624
2.2	1.0883	1.0603
2.4	1.0846	1.0575
2.6	1.0810	1.0545
2.8	1.0765	1.0511
3.0	1.0737	1.0494
3.2	1.0718	1.0483
3.4	1.0693	1.0463
3.6	1.0666	1.0441
3.8	1.0634	1.0418
4.0	1.0609	1.0399
4.2	1.0589	1.0380
4.4	1.0571	1.0356
4.6	1.0562	1.0345
4.8	1.0558	1.0348
5.0	1.0558	1.0352
5.2	1.0558	1.0351
5.4	1.0556	1.0349
5.6	1.0548	1.0349
5.8	1.0538	1.0347
6.0	1.0527	1.0341
6.2	1.0513	1.0335
6.4	1.0491	1.0330
6.6	1.0462	1.0313
6.8	1.0428	1.0297
7.0	1.0389	1.0277
7.2	1.0373	1.0266
7.4	1.0402	1.0273
7.6	1.0456	1.0300
7.8	1.0503	1.0335
8.0	1.0555	1.0374
8.2	1.0610	1.0414
8.4	1.0666	1.0453
8.6	1.0722	1.0499
8.8	1.0769	1.0531
9.0	1.0811	1.0567
9.2	1.0851	1.0608
9.4	1.0888	1.0651
9.6	1.0925	1.0688
9.8	1.0955	1.0719
10.0	1.0985	1.0750
10.2	1.1014	1.0778
10.4	1.1038	1.0796
10.6	1.1048	1.0808
*10.8	1.0000	1.0000
*11.0	1.0000	1.0000
*11.2	1.0000	1.0000
*11.4	1.0000	1.0000
*11.6	1.0000	1.0000
*11.8	1.0000	1.0000
*12.0	1.0000	1.0000

Note: V(z) data applicable for $0 \leq \text{burnup} < 11,000 \text{ MWD/MTU}$.

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Figure 3.2 V(z) as a Function of Core Height

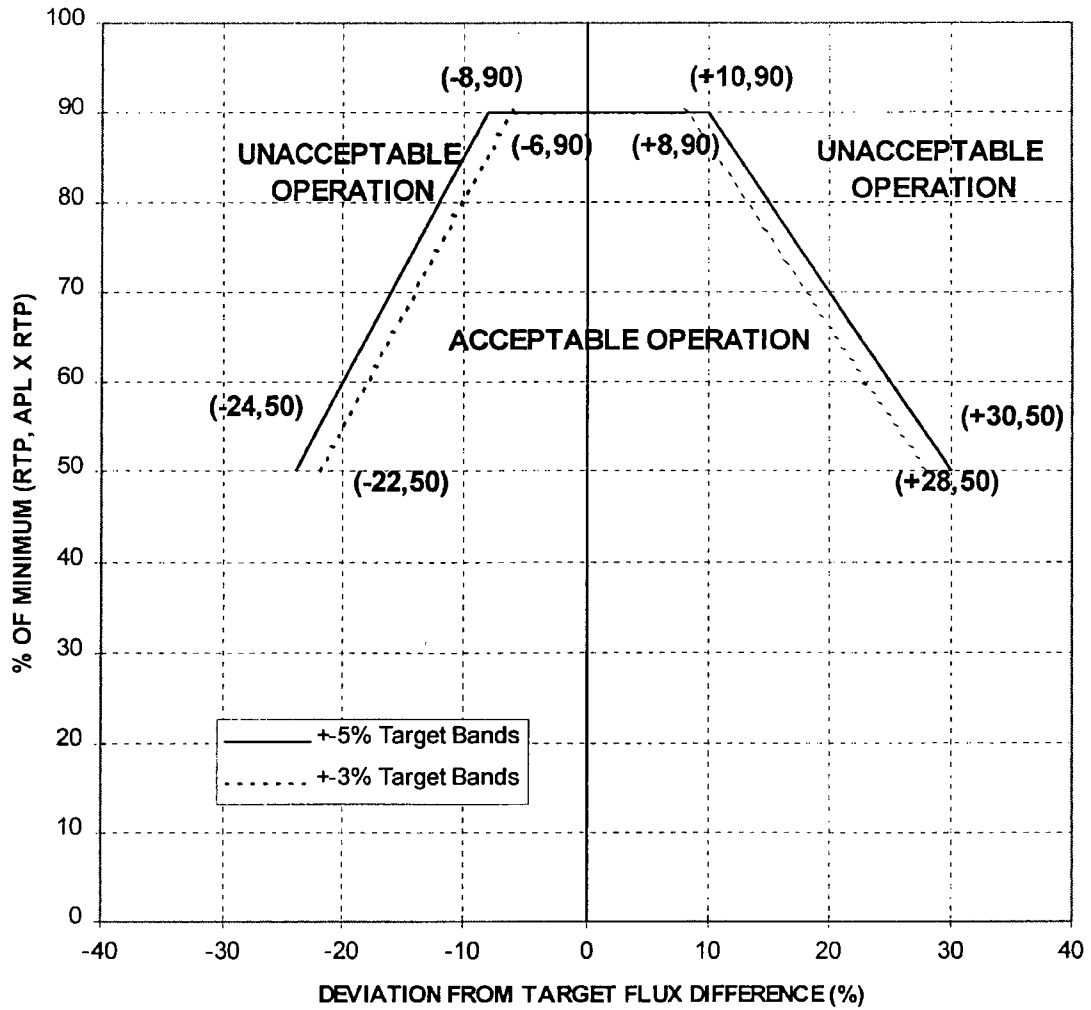


Height (Feet)	±5% V(Z)	±3% V(Z)
*0.0	1.0000	1.0000
*0.2	1.0000	1.0000
*0.4	1.0000	1.0000
*0.6	1.0000	1.0000
*0.8	1.0000	1.0000
*1.0	1.0000	1.0000
*1.2	1.0000	1.0000
1.4	1.1017	1.0696
1.6	1.0990	1.0682
1.8	1.0957	1.0660
2.0	1.0920	1.0635
2.2	1.0883	1.0611
2.4	1.0846	1.0587
2.6	1.0810	1.0552
2.8	1.0764	1.0515
3.0	1.0719	1.0486
3.2	1.0678	1.0462
3.4	1.0644	1.0439
3.6	1.0626	1.0419
3.8	1.0637	1.0404
4.0	1.0654	1.0410
4.2	1.0672	1.0427
4.4	1.0690	1.0443
4.6	1.0703	1.0456
4.8	1.0716	1.0468
5.0	1.0726	1.0479
5.2	1.0729	1.0487
5.4	1.0725	1.0488
5.6	1.0716	1.0483
5.8	1.0703	1.0479
6.0	1.0681	1.0468
6.2	1.0654	1.0452
6.4	1.0622	1.0436
6.6	1.0586	1.0415
6.8	1.0540	1.0385
7.0	1.0503	1.0370
7.2	1.0493	1.0364
7.4	1.0521	1.0359
7.6	1.0570	1.0359
7.8	1.0611	1.0385
8.0	1.0652	1.0417
8.2	1.0689	1.0448
8.4	1.0716	1.0476
8.6	1.0741	1.0503
8.8	1.0773	1.0534
9.0	1.0811	1.0569
9.2	1.0851	1.0608
9.4	1.0888	1.0651
9.6	1.0925	1.0688
9.8	1.0955	1.0719
10.0	1.0985	1.0750
10.2	1.1014	1.0778
10.4	1.1038	1.0796
10.6	1.1048	1.0808
*10.8	1.0000	1.0000
*11.0	1.0000	1.0000
*11.2	1.0000	1.0000
*11.4	1.0000	1.0000
*11.6	1.0000	1.0000
*11.8	1.0000	1.0000
*12.0	1.0000	1.0000

Note: V(z) data applicable for 11,000 ≤ burnup ≤ 18,540 MWD/MTU.

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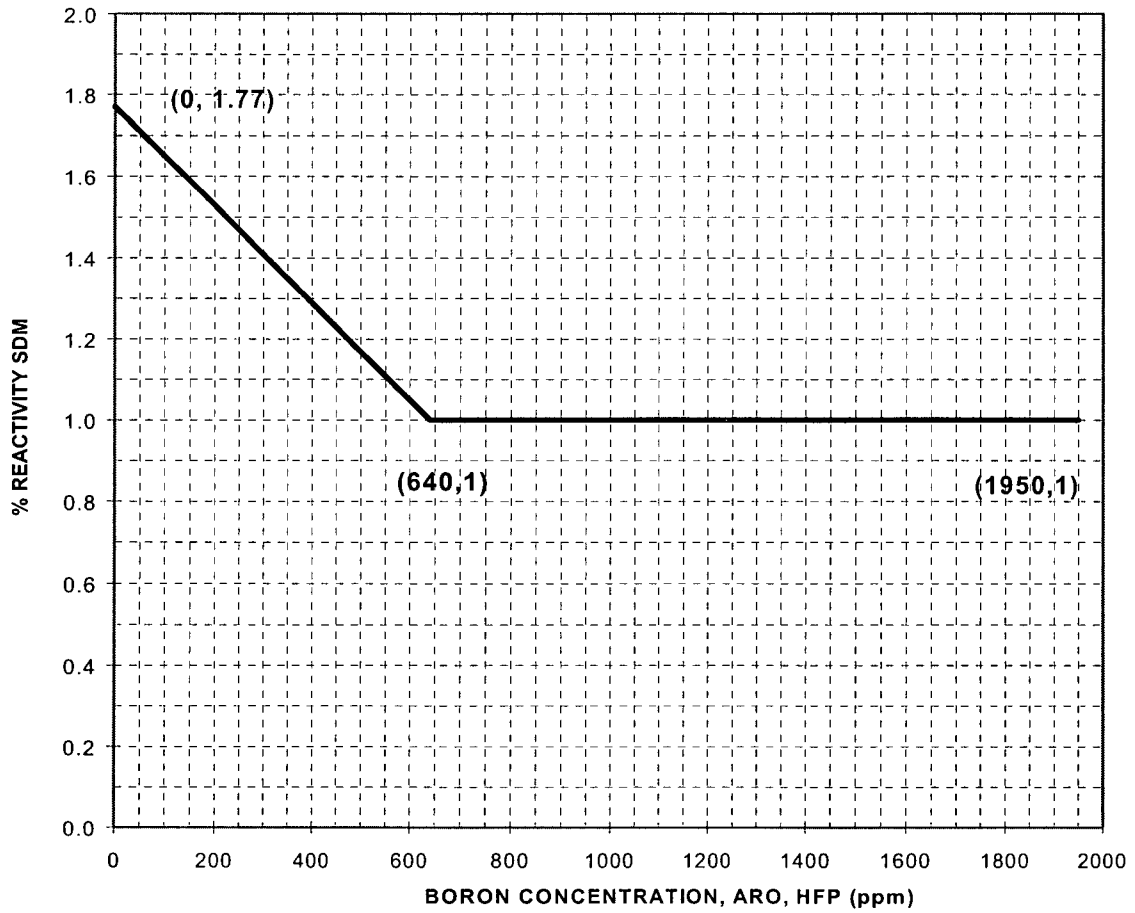
Figure 4.0, Allowable Deviation from Target Flux Difference



NOTE: For power levels above 90%, power operation is allowed within the target bands ($\pm 3\%$ and $\pm 5\%$).

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Figure 5.0, Shutdown Margin Versus Boron Concentration



ATTACHMENT 10.2

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PROCEDURES POTENTIALLY AFFECTED BY COLR REVISIONS

Revisions to the COLR may require that revisions be made to other plant procedures. At a minimum the following procedures should be reviewed to determine if they must be revised:

APP-005	GP-002
CP-010	GP-003
EST-002	GP-006
EST-003	GP-009-1
EST-028	GP-009-2
EST-048	GP-009-3
EST-049	GP-009-4
EST-050	GP-009-5
EST-105	GP-010
EST-146	LP-551
FMP-009	LP-552
FMP-012	OP-003
FMP-014	OP-910
FMP-019	OMP-003
FHP-003	PLP-100
Station Curve Book	ERFIS CAOC Software
NFP-NGGC-0003	NFP-NGGC-0018

The procedures listed above are those that are typically affected by COLR revisions; however, other procedures may also be affected.