

July 24, 2008

U.S. Nuclear Regulatory Commission
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ULNRC-05530

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
CORE OPERATING LIMITS REPORT**

Attached is the Callaway Plant Cycle 16 Core Operating Limits Report (COLR), Revision 2. Revision 2 incorporates changes to the COLR to address the Westinghouse Technical Bulletin TB-08-4, "F_Q Surveillance at Part Powers". The Bulletin provides notification that the current tools and guidance used for conducting technical specification surveillance measurements of transient heat flux peaking factors at reduced power conditions may be non-conservative. The Bulletin states that when performing transient F_Q surveillances at reduced power conditions, it is necessary to correct both the cycle specific core operating limits and the burn-up and axial dependent transient penalty factors (W(z)'s) at the time of measurement.

The specific guidance for conducting the transient F_Q measurement is provided in the COLR Section 2.5. Past COLR revisions addressed the adjustment of the limits, but did not address the adjustment of the W(z)'s. Consequently the COLR has been revised to correct any deficiency.

Callaway has reviewed the results of F_Q surveillances for recent cycles and determined that in all cases the plant operated within the bounds of the analysis. One case in cycle 16 was identified in which the measured F_Q, when adjusted as required by the Bulletin, would have slightly exceeded the limit (by 0.08%). Exceeding the limit by this amount would not have resulted in exceeding the core peaking factor limits. Callaway Technical Specifications require reducing both the positive and negative axial flux difference (AFD) limits by $\geq 1\%$ for each 1% that the transient F_Q limit is exceeded. This ensures that, even if a transient occurred, the core peaking factor limits are not exceeded. Callaway Plant operates to AFD limits that are more

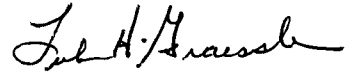
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conservative than those specified in the COLR and used in the safety analysis. The conservatism is greater than the margin by which the transient F_Q limit would have been exceeded.

This report is provided to the NRC Staff for information. It has been prepared in accordance with the requirements of Technical Specification 5.6.5.d.

If you have any questions concerning this report, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "Luke H. Graessle".

Luke H. Graessle

Manager, Regulatory Affairs

DJW/nls

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Callaway Cycle 16

Core Operating Limits Report
Revision 2

July 2008

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NF-SCP-07-27, Rev. 2

Reviewed by: B.D. Rodack 5224, 7/23/08
Approved by: J.M. De 9245, 7/23/08

Curve Book Figure 13-1, Rev 48

1.0 CORE OPERATING LIMITS REPORT

This Core Operating Limits Report (COLR) for Callaway Plant Cycle 16 has been prepared in accordance with the requirements of Technical Specification 5.6.5.

The Core Operating Limits affecting the following Technical Specifications are included in this report.

- 3.1.1, 3.1.4, 3.1.5, 3.1.6, 3.1.8 Shutdown Margin
- 3.1.3 Moderator Temperature Coefficient
- 3.1.5 Shutdown Bank Insertion Limits
- 3.1.6 Control Bank Insertion Limits
- 3.2.1 Heat Flux Hot Channel Factor
- 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor
- 3.2.3 Axial Flux Difference
- 2.1.1 Reactor Core Safety Limits (SLs)
- 3.3.1 Reactor Trip System (RTS) Instrumentation
- 3.4.1 RCS Pressure and Temperature
Departure from Nucleate Boiling (DNB) Limits

2.0 OPERATING LIMITS

The cycle-specific parameter limits for the specifications listed in Section 1.0 are presented in the subsections which follow. These limits have been developed using the NRC-approved methodologies specified in Technical Specification 5.6.5.

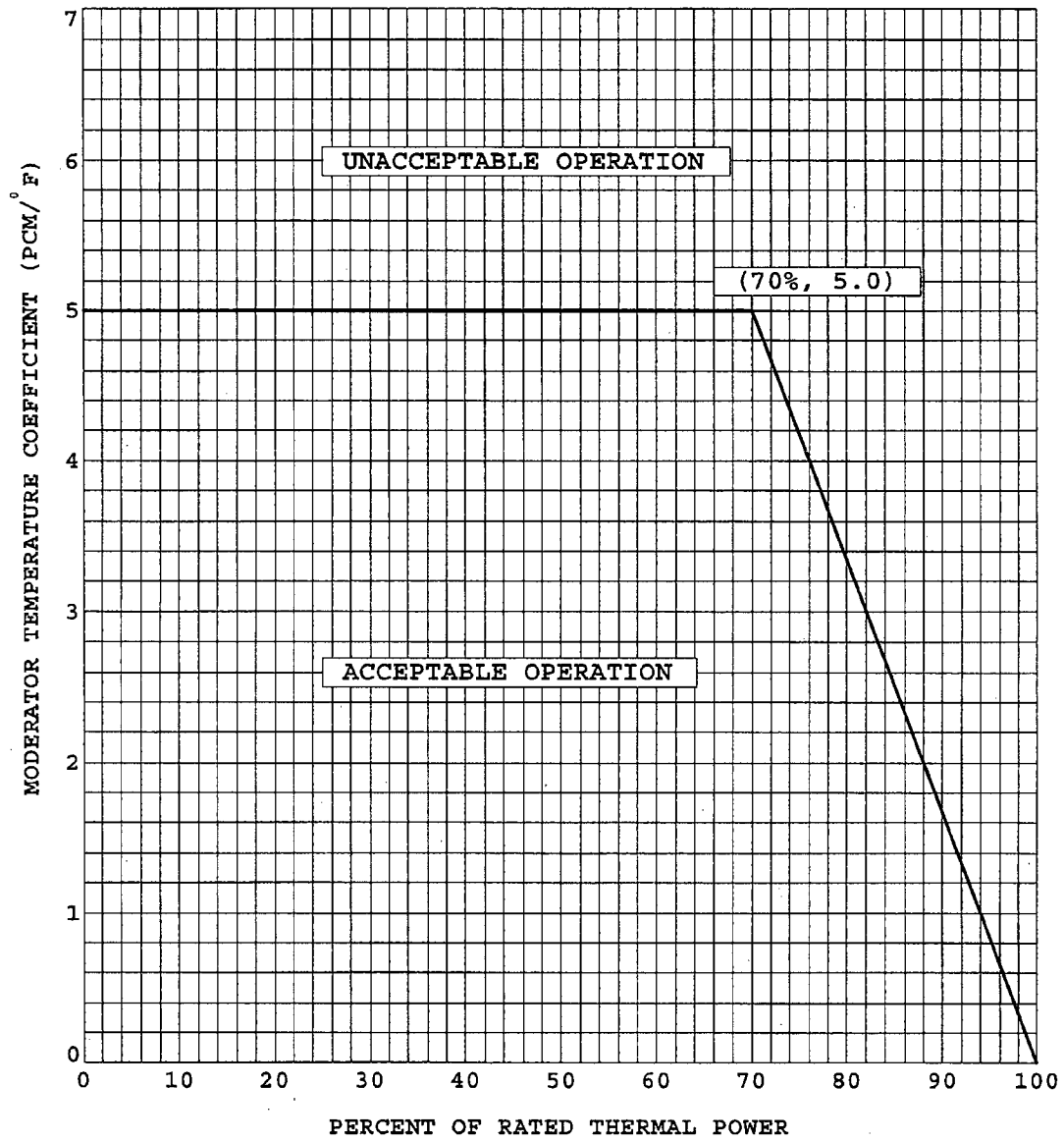
2.1 Shutdown Margin (Specifications 3.1.1, 3.1.4, 3.1.5, 3.1.6, and 3.1.8)

- 2.1.1 The Shutdown Margin in MODES 1-4 shall be greater than or equal to 1.3% $\Delta k/k$.
- 2.1.2 The Shutdown Margin prior to blocking Safety Injection below P-11 in MODES 3 and 4 shall be greater than 0% $\Delta k/k$ as calculated at 200°F.
- 2.1.3 The Shutdown Margin in MODE 5 shall be greater than or equal to 1.0% $\Delta k/k$.

2.2 Moderator Temperature Coefficient (Specification 3.1.3)

- 2.2.1 The Moderator Temperature Coefficient shall be less positive than the limits shown in Figure 1. These limits shall be referred to as upper limit.

The Moderator Temperature Coefficient shall be less negative than -47.9 pcm/°F. This limit shall be referred to as the lower limit.
- 2.2.2 The MTC 300 ppm surveillance limit is -40.4 pcm/°F (all rods withdrawn, Rated Thermal Power condition).
- 2.2.3 The MTC 60 ppm surveillance limit is -45.5 pcm/°F (all rods withdrawn, Rated Thermal Power condition).

**Figure 1**

**Callaway Cycle 16
Moderator Temperature Coefficient
Versus Power Level**

2.3 Shutdown Bank Insertion Limits
(Specification 3.1.5)

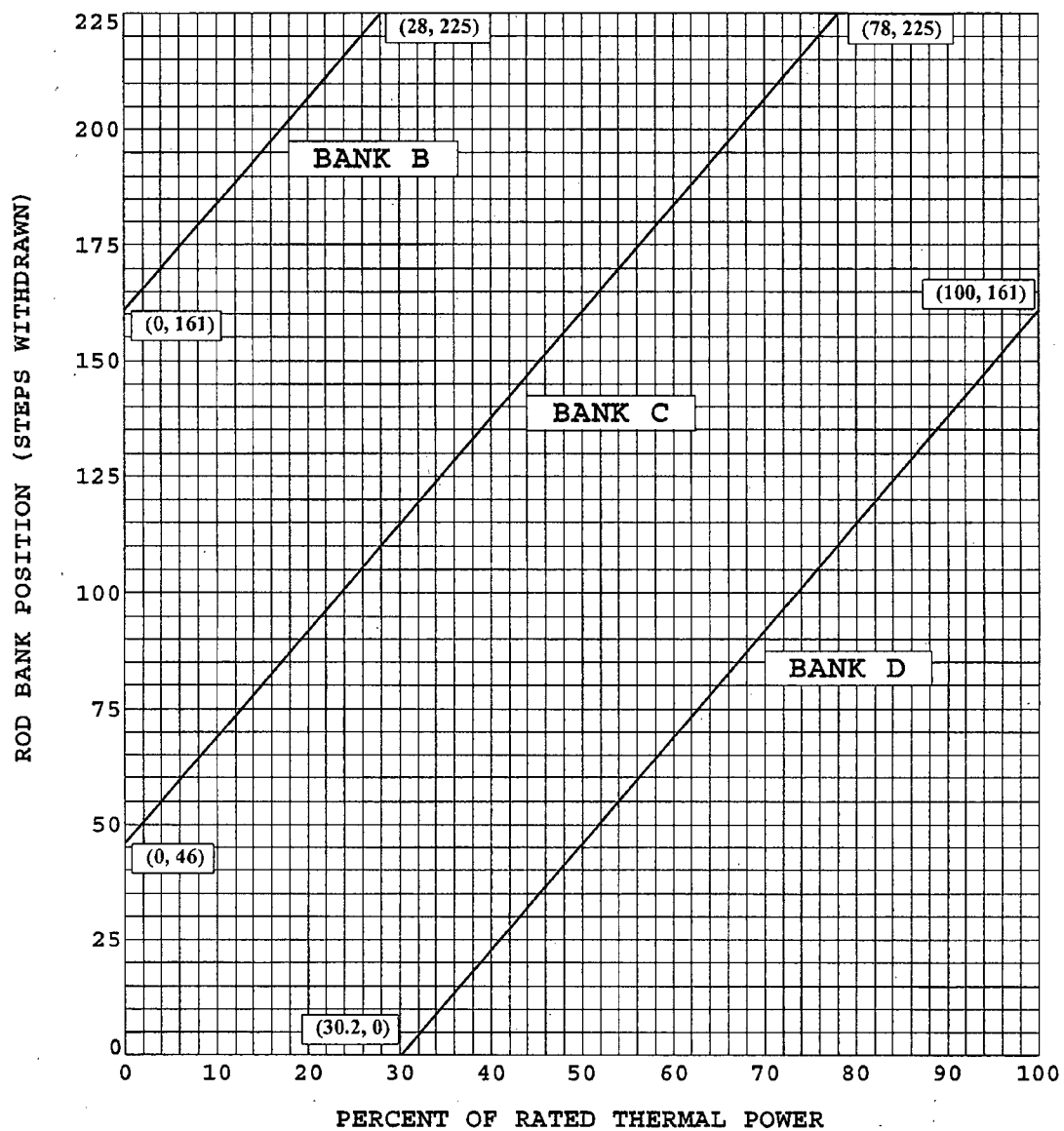
The shutdown banks shall be withdrawn to at least 225 steps.

2.4 Control Bank Insertion Limits
(Specification 3.1.6)

2.4.1 Control Bank insertion limits are specified by Figure 2.

2.4.2 Control Bank withdrawal sequence is A-B-C-D. The insertion sequence is the reverse of the withdrawal sequence.

2.4.3 The difference between each sequential Control Bank position is 115 steps when not fully inserted and not fully withdrawn.

**Figure 2**

**Callaway Cycle 16
Rod Bank Insertion Limits
Versus Rated Thermal Power - Four Loop Operation**

2.5 Heat Flux Hot Channel Factor - $F_Q(Z)$
(Specification 3.2.1)

$$F_Q(Z) \leq \frac{F_Q^{RTP}}{P} * K(Z) \quad \text{for } P > 0.5$$

$$F_Q(Z) \leq \frac{F_Q^{RTP}}{0.5} * K(Z) \quad \text{for } P \leq 0.5$$

$$\text{where: } P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$$

2.5.1 $F_Q^{RTP} = 2.50.$

2.5.2 $K(Z)$ is provided in Figure 3.

2.5.3 The $W(z)$ functions that are to be used in Technical Specification 3.2.1 and Surveillance Requirement 3.2.1.2 for determining $F_Q^W(z)$ are shown in Table A.1.

The $W(z)$ values have been determined for several burnups up to 20000 MWD/MTU in Cycle 16. This permits determination of $W(z)$ at any cycle burnup up to 20000 MWD/MTU through the use of three point interpolation. For cycle burnups greater than 20000 MWD/MTU, use of 20000 MWD/MTU $W(z)$ values without interpolation or extrapolation is conservative. The $W(z)$ values were determined assuming Cycle 16 operates with RAOC strategy. Also included is a $W(z)$ function that bounds the $W(z)$ values for all Cycle 16 burnups. Use of the bounding $W(z)$ values will be conservative for any Cycle 16 burnup; however, additional margin may be gained by using the burnup dependent $W(z)$ values.

The $W(z)$ values are provided for 73 axial points within the core height boundaries of 0 and 12 feet at intervals of 0.17 feet.

The $W(z)$ values are generated assuming that they will be used for a full power surveillance. When a part power surveillance is performed, the $W(z)$ values should be multiplied by the factor $1/P$, when P is > 0.5 . When P is ≤ 0.5 , the $W(z)$ values should be multiplied by the factor $1/(0.5)$, or 2.0. This is consistent with the adjustment in the $F_Q(z)$ limit at part power conditions.

Table A.2 shows the burnup dependent F_Q penalty factors for Cycle 16. These values shall be used to increase $F_Q^W(z)$ when required by Technical Specification Surveillance Requirement 3.2.1.2. A 2% penalty factor should be used at all cycle burnups that are outside the range of Table A.2.

- 2.5.4 The uncertainty, U_{FQ} , to be applied to measured $F_Q(Z)$ shall be calculated by the following

$$U_{FQ} = U_{qu} * U_e$$

where:

U_{qu} = Base F_Q measurement uncertainty = 1.05 when PDMS is inoperable
(U_{qu} is defined by PDMS when OPERABLE)

U_e = Engineering uncertainty factor = 1.03

Table A.1
W(z) versus Core Height
(Top and Bottom 6% Excluded)

Height (feet)	150 MWD/MTU	4000 MWD/MTU	10000 MWD/MTU	20000 MWD/MTU	Bounding W(z)
0.00 (bottom)	1.0000	1.0000	1.0000	1.0000	1.0000
0.17	1.0000	1.0000	1.0000	1.0000	1.0000
0.33	1.0000	1.0000	1.0000	1.0000	1.0000
0.50	1.0000	1.0000	1.0000	1.0000	1.0000
0.67	1.0000	1.0000	1.0000	1.0000	1.0000
0.83	1.3934	1.4732	1.4016	1.3370	1.4732
1.00	1.3853	1.4618	1.3944	1.3324	1.4618
1.17	1.3730	1.4462	1.3835	1.3244	1.4462
1.33	1.3588	1.4281	1.3704	1.3144	1.4281
1.50	1.3438	1.4084	1.3559	1.3039	1.4084
1.67	1.3284	1.3877	1.3405	1.2930	1.3878
1.83	1.3122	1.3662	1.3244	1.2817	1.3662
2.00	1.2951	1.3436	1.3076	1.2699	1.3436
2.17	1.2774	1.3202	1.2904	1.2578	1.3202
2.33	1.2594	1.2965	1.2733	1.2455	1.2967
2.50	1.2412	1.2730	1.2568	1.2332	1.2732
2.67	1.2240	1.2488	1.2426	1.2203	1.2509
2.83	1.2093	1.2253	1.2316	1.2072	1.2327
3.00	1.1969	1.2105	1.2225	1.1985	1.2225
3.17	1.1886	1.2022	1.2145	1.1949	1.2146
3.33	1.1859	1.1936	1.2071	1.1936	1.2084
3.50	1.1833	1.1867	1.2008	1.1936	1.2030
3.67	1.1797	1.1821	1.1952	1.1944	1.1987
3.83	1.1771	1.1788	1.1896	1.1998	1.2005
4.00	1.1752	1.1752	1.1834	1.2052	1.2052
4.17	1.1732	1.1709	1.1768	1.2091	1.2091
4.33	1.1706	1.1662	1.1705	1.2121	1.2121
4.50	1.1675	1.1610	1.1640	1.2143	1.2143
4.67	1.1639	1.1552	1.1573	1.2152	1.2152
4.83	1.1596	1.1490	1.1508	1.2150	1.2150
5.00	1.1552	1.1421	1.1439	1.2136	1.2136
5.17	1.1495	1.1349	1.1366	1.2108	1.2108
5.33	1.1425	1.1273	1.1289	1.2065	1.2065
5.50	1.1412	1.1182	1.1198	1.2025	1.2025
5.67	1.1457	1.1101	1.1134	1.2015	1.2015
5.83	1.1505	1.1086	1.1178	1.2059	1.2059
6.00	1.1588	1.1088	1.1267	1.2145	1.2145
6.17	1.1709	1.1129	1.1420	1.2247	1.2247
6.33	1.1837	1.1213	1.1562	1.2340	1.2340
6.50	1.1958	1.1315	1.1693	1.2424	1.2424
6.67	1.2065	1.1420	1.1815	1.2504	1.2504
6.83	1.2158	1.1529	1.1923	1.2583	1.2583

Table A.1
W(z) versus Core Height
(Top and Bottom 6% Excluded)

Height (feet)	150 MWD/MTU	4000 MWD/MTU	10000 MWD/MTU	20000 MWD/MTU	Bounding W(z)
7.00	1.2239	1.1643	1.2019	1.2656	1.2656
7.17	1.2301	1.1759	1.2100	1.2714	1.2714
7.33	1.2339	1.1874	1.2160	1.2754	1.2754
7.50	1.2387	1.1981	1.2220	1.2777	1.2777
7.67	1.2447	1.2079	1.2283	1.2782	1.2782
7.83	1.2489	1.2168	1.2330	1.2770	1.2773
8.00	1.2540	1.2237	1.2378	1.2739	1.2739
8.17	1.2617	1.2304	1.2439	1.2691	1.2691
8.33	1.2703	1.2410	1.2500	1.2630	1.2715
8.50	1.2763	1.2517	1.2550	1.2540	1.2763
8.67	1.2797	1.2606	1.2584	1.2448	1.2797
8.83	1.2854	1.2708	1.2608	1.2438	1.2858
9.00	1.2946	1.2800	1.2603	1.2449	1.2955
9.17	1.3059	1.2883	1.2571	1.2502	1.3065
9.33	1.3159	1.3007	1.2572	1.2580	1.3178
9.50	1.3218	1.3167	1.2605	1.2633	1.3273
9.67	1.3254	1.3335	1.2719	1.2679	1.3350
9.83	1.3343	1.3484	1.2818	1.2831	1.3484
10.00	1.3486	1.3690	1.2906	1.3017	1.3692
10.17	1.3669	1.3982	1.2994	1.3172	1.3982
10.33	1.3877	1.4279	1.3078	1.3318	1.4279
10.50	1.4104	1.4550	1.3195	1.3459	1.4550
10.67	1.4333	1.4782	1.3351	1.3590	1.4782
10.83	1.4540	1.4975	1.3494	1.3700	1.4975
11.00	1.4690	1.5123	1.3597	1.3770	1.5123
11.17	1.4723	1.5199	1.3651	1.3763	1.5199
11.33	1.0000	1.0000	1.0000	1.0000	1.0000
11.50	1.0000	1.0000	1.0000	1.0000	1.0000
11.67	1.0000	1.0000	1.0000	1.0000	1.0000
11.83	1.0000	1.0000	1.0000	1.0000	1.0000
12.00 (top)	1.0000	1.0000	1.0000	1.0000	1.0000

Table A.2

 F_Q Penalty Factors as a Function of Cycle Burnup

<u>Cycle 16 Burnup</u>	<u>$F_Q^w(z)$ Penalty Factor (%)</u>
1009	2.06
1180	2.33
1352	2.31
1524	2.26

Note: All cycle burnups not in the range of the above table shall use a 2.0% penalty factor for compliance with Surveillance Requirement 3.2.1.2.

For values of burnup between two of those listed in the first column, the greater of the two corresponding penalty factors shall be used for compliance with Surveillance Requirement 3.2.1.2.

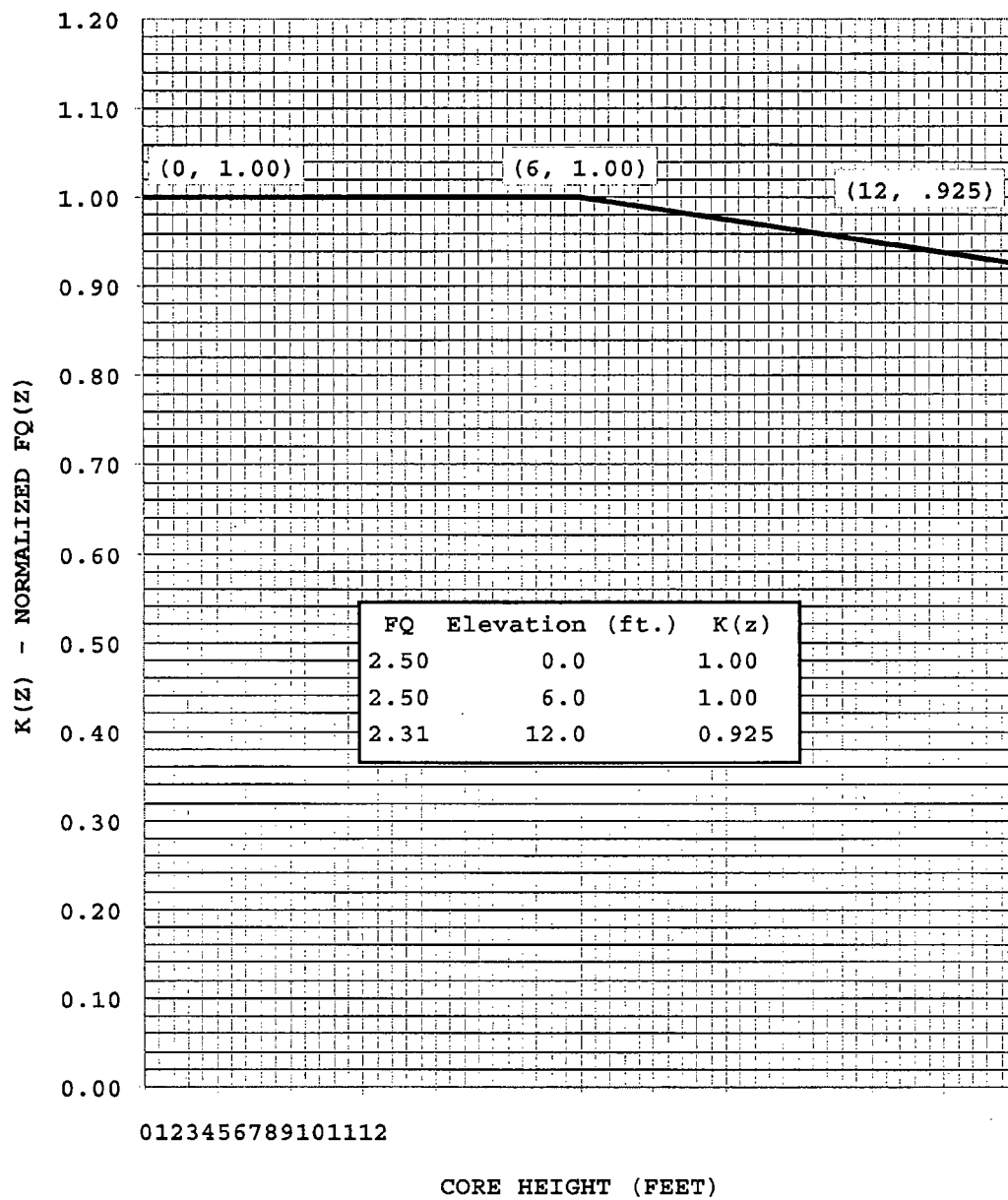


Figure 3

Callaway Cycle 16
 $K(z)$ - Normalized $F_Q(z)$
 as a Function of Core Height

2.6 Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}^N$
(Specification 3.2.2)

$$F_{\Delta H}^N \leq F_{\Delta H}^{RTP} [1 + PF_{\Delta H}(1-P)]$$

$$\text{where: } P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$$

2.6.1 $F_{\Delta H}^{RTP} = 1.59$

2.6.2 $PF_{\Delta H} = 0.3$

2.7 Axial Flux Difference
(Specification 3.2.3)

The Axial Flux Difference (AFD) Limits are provided in Figure 4.

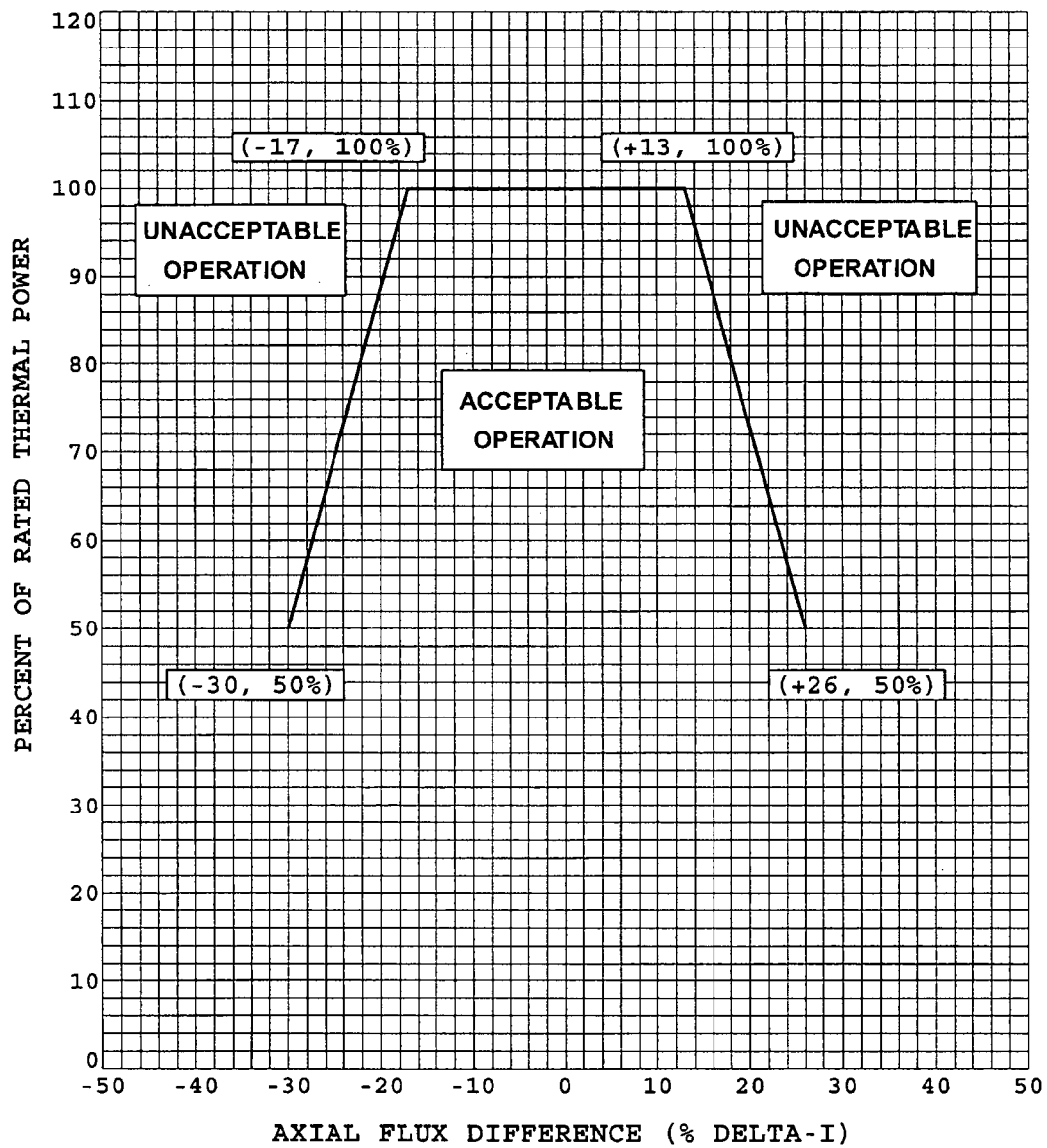
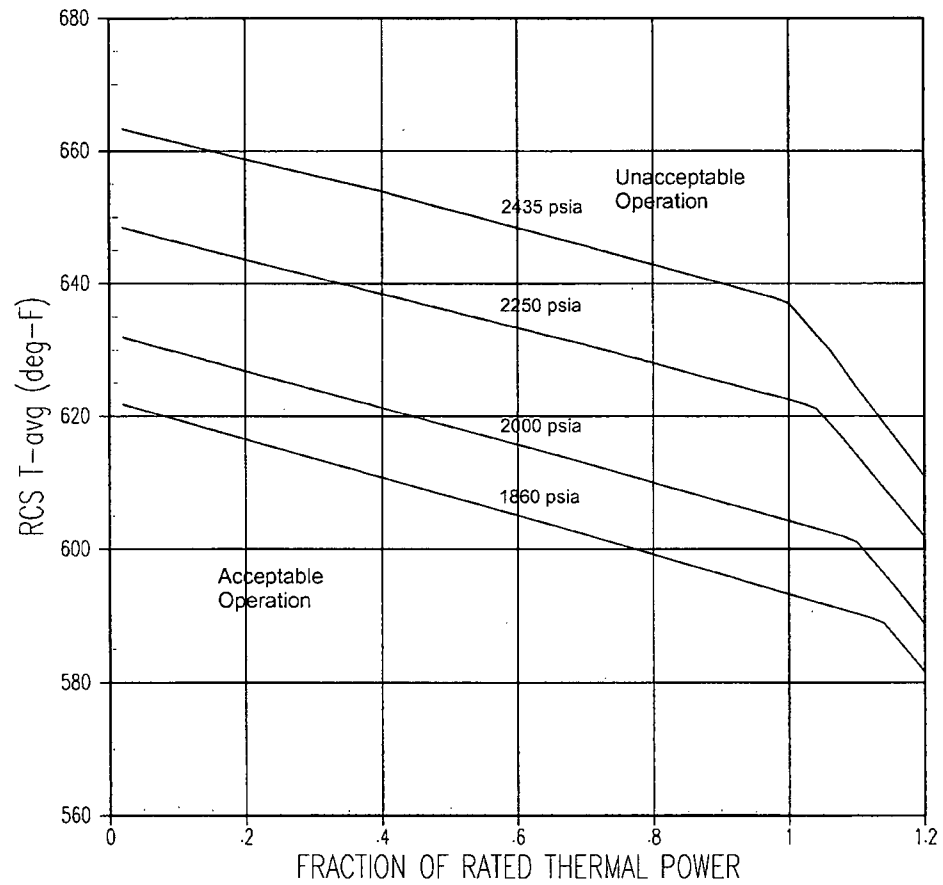


Figure 4

Callaway Cycle 16
Axial Flux Difference Limits as a Function
of Rated Thermal Power for RAOC

2.8 Reactor Core Safety Limits
 (Safety Limit 2.1.1)

In MODES 1 and 2, the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the limits in Figure 5.

**Figure 5****Callaway Cycle 16
Reactor Core Safety Limits**

2.9 Reactor Trip System Overtemperature ΔT Setpoint Parameter Values
(Specification 3.3.1)

<u>Parameter</u>	<u>Value</u>
Overtemperature ΔT reactor trip setpoint	$K_1 = 1.1950$
Overtemperature ΔT reactor trip setpoint T_{avg} coefficient	$K_2 = 0.0251/^{\circ}\text{F}$
Overtemperature ΔT reactor trip setpoint pressure coefficient	$K_3 = 0.00116/\text{psig}$
Nominal T_{avg} at RTP	$T' \leq 585.3^{\circ}\text{F}$
Nominal RCS operating pressure	$P' = 2235 \text{ psig}$
Measured RCS ΔT lead/lag time constants	$\tau_1 \geq 8 \text{ sec}$ $\tau_2 \leq 3 \text{ sec}$
Measured RCS ΔT lag time constant	$\tau_3 = 0 \text{ sec}$
Measured RCS average temperature lead/lag time constants	$t_4 \geq 28 \text{ sec}$ $t_5 \leq 4 \text{ sec}$
Measured RCS average temperature lag time constant	$\tau_6 = 0 \text{ sec}$
$f_1(\Delta I) = -0.0325 \{21\% + (q_t - q_b)\}$	when $(q_t - q_b) < -21\% \text{ RTP}$
0	when $-21\% \text{ RTP} \leq (q_t - q_b) \leq 8\% \text{ RTP}$
$0.02973 \{(q_t - q_b) - 8\%\}$	when $(q_t - q_b) > 8\% \text{ RTP}$

Where, q_t and q_b are percent RTP in the upper and lower halves of the core, respectively, and $q_t + q_b$ is the total THERMAL POWER in percent RTP.

2.10 Reactor Trip System Overpower ΔT Setpoint Parameter Values
(Specification 3.3.1)

<u>Parameter</u>	<u>Value</u>
Overpower ΔT reactor trip setpoint	$K_4 = 1.1073$
Overpower ΔT reactor trip setpoint T_{avg} rate/lag coefficient	$K_5 = 0.02/^{\circ}\text{F}$ for increasing T_{avg} $= 0/^{\circ}\text{F}$ for decreasing T_{avg}
Overpower ΔT reactor trip setpoint T_{avg} heatup coefficient	$K_6 = 0.0015/^{\circ}\text{F}$ for $T > T''$ $= 0/^{\circ}\text{F}$ for $T \leq T''$
Nominal T_{avg} at RTP	$T'' \leq 585.3^{\circ}\text{F}$
Measured RCS ΔT lead/lag time constants	$\tau_1 \geq 8 \text{ sec}$ $\tau_2 \leq 3 \text{ sec}$
Measured RCS ΔT lag time constant	$\tau_3 = 0 \text{ sec}$
Measured RCS average temperature lag time constant	$\tau_6 = 0 \text{ sec}$
Measured RCS average temperature rate/lag time constant	$\tau_7 \geq 10 \text{ sec}$
$f_2(\Delta I) = 0$ for all ΔI .	

2.11 RCS Pressure and Temperature Departure from Nucleate Boiling (DNB) Limits
(Specification 3.4.1)

<u>Parameter</u>	<u>Indicated Value</u>
Pressurizer pressure	$\geq 2223 \text{ psig}$
RCS average temperature	$\leq 590.1 ^{\circ}\text{F}$

APPENDIX A

Approved Analytical Methods for Determining Core Operating Limits

The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

NRC letter dated May 28, 1985, "Acceptance for Referencing of Licensing Topical Report WCAP-9272(P)/9273(NP), "Westinghouse Reload Safety Evaluation Methodology"."
2. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control - F_Q Surveillance Technical Specification," February 1994.

NRC Safety Evaluation Report dated November 26, 1993, "Acceptance for Referencing of Revised Version of Licensing Topical Report WCAP-10216-P, Rev. 1, Relaxation of Constant Axial Offset Control - F_Q Surveillance Technical Specification" (TAC No. M88206).
3. WCAP-10266-P-A, Revision 2, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code," March 1987.

NRC letter dated November 13, 1986, "Acceptance for Referencing of Licensing Topical Report WCAP-10266 'The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code.'"

WCAP-10266-P-A, Addendum 1, Revision 2, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code Addendum 1: Power Shape Sensitivity Studies," December 1987.

NRC letter dated September 15, 1987, "Acceptance for Referencing of Addendum 1 to WCAP-10266, BASH Power Shape Sensitivity Studies."

WCAP-10266-P-A, Addendum 2, Revision 2, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code Addendum 2: BASH Methodology Improvements and Reliability Enhancements," May 1988.

NRC letter dated January 20, 1988, "Acceptance for Referencing Topical Report Addendum 2 to WCAP-10266, Revision 2, "BASH Methodology Improvements and Reliability Enhancements."
4. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," April 1995.

NRC Safety Evaluation Reports dated July 1, 1991, "Acceptance for Referencing of Topical Report WCAP-12610, 'VANTAGE+ Fuel Assembly Reference Core Report' (TAC NO. 77258)."

NRC Safety Evaluation Report dated September 15, 1994, "Acceptance for Referencing of Topical Report WCAP-12610, Appendix B, Addendum 1, 'Extended Burnup Fuel Design Methodology and ZIRLO Fuel Performance Models' (TAC NO. M86416)."

5. WCAP-11397-P-A, "Revised Thermal Design Procedure," April 1989.

NRC Safety Evaluation Report dated January 17, 1989, "Acceptance for Referencing of Licensing Topical Report WCAP-11397, "Revised Thermal Design Procedure."

6. WCAP-14565-P-A, "VIPRE-01 Modeling and Qualification for Pressurized Water Reactor Non-LOCA Thermal-Hydraulic Safety Analysis," October 1999.

NRC letter dated January 19, 1999, "Acceptance for Referencing of Licensing Topical Report WCAP-14565, 'VIPRE-01 Modeling and Qualification for Pressurized Water Reactor Non-LOCA Thermal/Hydraulic Safety Analysis' (TAC No. M98666)."

7. WCAP-10851-P-A, "Improved Fuel Performance Models for Westinghouse Fuel Rod Design and Safety Evaluations," August 1988.

NRC letter dated May 9, 1988, "Westinghouse Topical Report WCAP-10851, 'Improved Fuel Performance Models for Westinghouse Fuel Rod Design and Safety Evaluations.'"

8. WCAP-15063-P-A, Revision 1, with Errata, "Westinghouse Improved Performance Analysis and Design Model (PAD 4.0)," July 2000.

NRC letter dated April 24, 2000, "Safety Evaluation Related to Topical Report WCAP-15063, Revision 1, 'Westinghouse Improved Performance Analysis and Design Model (PAD 4.0)' (TAC NO. MA2086)."

9. WCAP-8745-P-A, "Design Bases for the Thermal Overpower ΔT and Thermal Overtemperature ΔT Trip Functions," September 1986.

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