



BRUCE H HAMILTON  
Vice President  
McGuire Nuclear Station

Duke Energy Corporation  
MG01VP / 12700 Hagers Ferry Road  
Huntersville, NC 28078

704-875-5333  
704-875-4809 fax  
bhhamilton@duke-energy.com

January 7, 2009

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: Duke Energy Carolinas, LLC (Duke)  
McGuire Nuclear Station  
Docket Nos. 50-369  
Unit 1, Cycle 20, Revision 1  
Core Operating Limits Report

Pursuant to McGuire Technical Specification (TS) 5.6.5.d, please find enclosed Revision 1 of the McGuire Unit 1 Cycle 20 Core Operating Limits Report (COLR). The COLR was revised to include limits specific for completion of the Rod Cluster Control Assembly (RCCA) movement test for all shutdown banks and control banks A, B, and C for the remainder of cycle 20.

Questions regarding this submittal should be directed to Kay Crane, McGuire Regulatory Compliance at (704) 875-4306.

Bruce H. Hamilton

Attachment

A001  
NRR

U. S. Nuclear Regulatory Commission

January 7, 2009

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cc: Mr. John Stang, Project Manager  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Mr. Luis A. Reyes  
Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II  
Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
Atlanta, GA 30323

Mr. Joe Brady  
Senior Resident Inspector  
McGuire Nuclear Station

**McGuire Unit 1 Cycle 20****Core Operating Limits Report  
Revision 1****December 2008**

Calculation Number: MCC-1553.05-00-0489, Rev. 1

Duke Energy

|              |  | Date            |
|--------------|--|-----------------|
| Prepared By: | <u>Nicholas R Huger</u>                                | <u>12/10/08</u> |
| Checked By:  | <u>ML Elder</u>  | <u>12/11/08</u> |
| Checked By:  | <u>M. S. Hershaw</u><br>(Sections 2.2 and 2.10 – 2.17) | <u>12/11/08</u> |
| Approved By: | <u>RC Harvey</u>                                       | <u>12/11/08</u> |

**QA Condition 1**

The information presented in this report has been prepared and issued in accordance with McGuire Technical Specification 5.6.5.

## McGuire 1 Cycle 20 Core Operating Limits Report

## INSPECTION OF ENGINEERING INSTRUCTIONS

Inspection Waived By: RC Haway  
(Sponsor)Date: 12/11/08CATAWBAInspection  
Waived

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| MCE (Mechanical & Civil) | <input type="checkbox"/> | Inspected By/Date: _____ |
| RES (Electrical Only)    | <input type="checkbox"/> | Inspected By/Date: _____ |
| RES (Reactor)            | <input type="checkbox"/> | Inspected By/Date: _____ |
| MOD                      | <input type="checkbox"/> | Inspected By/Date: _____ |
| Other ( _____ )          | <input type="checkbox"/> | Inspected By/Date: _____ |

OCONEEInspection  
Waived

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| MCE (Mechanical & Civil) | <input type="checkbox"/> | Inspected By/Date: _____ |
| RES (Electrical Only)    | <input type="checkbox"/> | Inspected By/Date: _____ |
| RES (Reactor)            | <input type="checkbox"/> | Inspected By/Date: _____ |
| MOD                      | <input type="checkbox"/> | Inspected By/Date: _____ |
| Other ( _____ )          | <input type="checkbox"/> | Inspected By/Date: _____ |

MCGUIREInspection  
Waived

|                          |                                     |                          |
|--------------------------|-------------------------------------|--------------------------|
| MCE (Mechanical & Civil) | <input checked="" type="checkbox"/> | Inspected By/Date: _____ |
| RES (Electrical Only)    | <input checked="" type="checkbox"/> | Inspected By/Date: _____ |
| RES (Reactor)            | <input checked="" type="checkbox"/> | Inspected By/Date: _____ |
| MOD                      | <input checked="" type="checkbox"/> | Inspected By/Date: _____ |
| Other ( _____ )          | <input type="checkbox"/>            | Inspected By/Date: _____ |

## **McGuire 1 Cycle 20 Core Operating Limits Report**

### **Implementation Instructions for Revision 1**

#### **Revision Description and PIP Tracking**

Revision 1 of the McGuire Unit 1 Cycle 20 COLR contains limits specific to the reload core and was revised to include limits specific for completion of the RCCA movement test for all shutdown banks and control banks A, B, and C for the remainder of McGuire Unit 1 Cycle 20. Revision 1 was initiated by PIP #M-08-01203, CA#6.

#### **Implementation Schedule**

Revision 1 may become effective immediately but must become effective prior to 1/15/2009. This date is the expected date for the next scheduled quarterly RCCA movement test via PIP #M-08-01203, CA#6. The McGuire Unit 1 Cycle 20 COLR will cease to be effective during No MODE between Cycle 20 and 21.

#### **Data files to be Implemented**

No data files are transmitted as part of this document.

**McGuire 1 Cycle 20 Core Operating Limits Report**

## REVISION LOG

| <u>Revision</u> | <u>Effective Date</u> | <u>Pages Affected</u> | <u>COLR</u>        |
|-----------------|-----------------------|-----------------------|--------------------|
| 0               | August 2008           | 1-32, Appendix A*     | M1C20 COLR, Rev. 0 |
| 1               | December 2008         | 1-32                  | M1C20 COLR, Rev. 1 |

- \* Appendix A contains power distribution monitoring factors used in Technical Specification Surveillance. Appendix A is included only in the electronic COLR copy sent to the NRC.

## McGuire 1 Cycle 20 Core Operating Limits Report

### 1.0 Core Operating Limits Report

This Core Operating Limits Report (COLR) has been prepared in accordance with the requirements of the Technical Specification 5.6.5. The Technical Specifications that reference the COLR are summarized below.

| <u>TS<br/>Number</u> | <u>Technical Specifications</u>                      | <u>COLR Parameter</u>                             | <u>COLR<br/>Section</u> | <u>EI<br/>Page</u> |
|----------------------|--|---|-------------------------|--------------------|
| 1.1                  | Requirements for Operational Mode 6                  | Mode 6 Definition                                 | 2.1                     | 9                  |
| 2.1.1                | Reactor Core Safety Limits                           | RCS Temperature and<br>Pressure Safety Limits     | 2.2                     | 9                  |
| 3.1.1                | Shutdown Margin                                      | Shutdown Margin                                   | 2.3                     | 9                  |
| 3.1.3                | Moderator Temperature Coefficient                    | MTC   | 2.4                     | 11                 |
| 3.1.4                | Rod Group Alignment Limits                           | Shutdown Margin                                   | 2.3                     | 9                  |
| 3.1.5                | Shutdown Bank Insertion Limits                       | Shutdown Margin                                   | 2.3                     | 9                  |
| 3.1.5                | Shutdown Bank Insertion Limits                       | Shutdown Bank Insertion<br>Limit                  | 2.5                     | 11                 |
| 3.1.6                | Control Bank Insertion Limits                        | Shutdown Margin                                   | 2.3                     | 9                  |
| 3.1.6                | Control Bank Insertion Limits                        | Control Bank Insertion<br>Limit                   | 2.6                     | 15                 |
| 3.1.8                | Physics Test Exceptions                              | Shutdown Margin                                   | 2.3                     | 9                  |
| 3.2.1                | Heat Flux Hot Channel Factor                         | F <sub>q</sub> , AFD, OTΔT and<br>Penalty Factors | 2.7                     | 15                 |
| 3.2.2                | Nuclear Enthalpy Rise Hot Channel<br>Factor          | FΔH, AFD and<br>Penalty Factors                   | 2.8                     | 20                 |
| 3.2.3                | Axial Flux Difference                                | AFD   | 2.9                     | 21                 |
| 3.3.1                | Reactor Trip System Instrumentation<br>Setpoint      | OTΔT and OPΔT<br>Constants                        | 2.10                    | 24                 |
| 3.4.1                | RCS Pressure, Temperature and Flow<br>limits for DNB | RCS Pressure,<br>Temperature and Flow             | 2.11                    | 26                 |
| 3.5.1                | Accumulators   | Max and Min Boron Conc.                           | 2.12                    | 26                 |
| 3.5.4                | Refueling Water Storage Tank                         | Max and Min Boron Conc.                           | 2.13                    | 26                 |
| 3.7.14               | Spent Fuel Pool Boron Concentration                  | Min Boron Concentration                           | 2.14                    | 28                 |
| 3.9.1                | Refueling Operations – Boron<br>Concentration        | Min Boron Concentration                           | 2.15                    | 28                 |
| 5.6.5                | Core Operating Limits Report (COLR)                  | Analytical Methods                                | 1.1                     | 6                  |

The Selected Licensee Commitments that reference this report are listed below:

| <u>SLC Number</u> | <u>Selected Licensing Commitment</u> | <u>COLR Parameter</u>                          | <u>COLR<br/>Section</u> | <u>EI<br/>Page</u> |
|-------------------|--------------------------------------|--|-------------------------|--------------------|
| 16.9.14           | Borated Water Source – Shutdown      | Borated Water Volume and<br>Conc. for BAT/RWST | 2.16                    | 29                 |
| 16.9.11           | Borated Water Source – Operating     | Borated Water Volume and<br>Conc. for BAT/RWST | 2.17                    | 30                 |

## McGuire 1 Cycle 20 Core Operating Limits Report

### 1.1 Analytical Methods

The analytical methods used to determine core operating limits for parameters identified in Technical Specifications and previously reviewed and approved by the NRC as specified in Technical Specification 5.6.5 are as follows.

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," (W Proprietary).

Revision 0

Report Date: July 1985

Not Used for M1C20

2. WCAP-10054-P-A, "Westinghouse Small Break ECCS Evaluation Model using the NOTRUMP Code," (W Proprietary).

Revision 0

Report Date: August 1985

3. WCAP-10266-P-A, "The 1981 Version Of Westinghouse Evaluation Model Using BASH CODE", (W Proprietary).

Revision 2

Report Date: March 1987

Not Used for M1C20

4. WCAP-12945-P-A, Volume 1 and Volumes 2-5, "Code Qualification Document for Best-Estimate Loss of Coolant Analysis," (W Proprietary).

Revision: Volume 1 (Revision 2) and Volumes 2-5 (Revision 1)

Report Date: March 1998

5. BAW-10168P-A, "B&W Loss-of-Coolant Accident Evaluation Model for Recirculating Steam Generator Plants," (B&W Proprietary).

Revision 1

SER Date: January 22, 1991

Revision 2

SER Dates: August 22, 1996 and November 26, 1996.

Revision 3

SER Date: June 15, 1994.

Not Used for M1C20



## McGuire 1 Cycle 20 Core Operating Limits Report

### 1.1 Analytical Methods (continued)

6. DPC-NE-3000-PA, "Thermal-Hydraulic Transient Analysis Methodology," (DPC Proprietary).

Revision 3

SER Date: September 24, 2003

7. DPC-NE-3001-PA, "Multidimensional Reactor Transients and Safety Analysis Physics Parameter Methodology," (DPC Proprietary).

Revision 0

Report Date: November 1991 (Republished December 2000)

8. DPC-NE-3002-A, "FSAR Chapter 15 System Transient Analysis Methodology".

Revision 4

SER Date: April 6, 2001

9. DPC-NE-2004P-A, "Duke Power Company McGuire and Catawba Nuclear Stations Core Thermal-Hydraulic Methodology using VIPRE-01," (DPC Proprietary).

Revision 1

SER Date: February 20, 1997

10. DPC-NE-2005P-A, "Thermal Hydraulic Statistical Core Design Methodology," (DPC Proprietary).

Revision 3

SER Date: September 16, 2002

11. DPC-NE-2008P-A, "Fuel Mechanical Reload Analysis Methodology Using TACO3," (DPC Proprietary).

Revision 0

SER Date: April 3, 1995

**Not Used for M1C20**

12. DPC-NE-2009-P-A, "Westinghouse Fuel Transition Report," (DPC Proprietary).

Revision 2

SER Date: December 18, 2002

13. DPC-NE-1004A, "Nuclear Design Methodology Using CASMO-3/SIMULATE-3P."

Revision 1

SER Date: April 26, 1996

**Not Used for M1C20**

## McGuire 1 Cycle 20 Core Operating Limits Report

### 1.1 Analytical Methods (continued)

14. DPC-NF-2010A, "Duke Power Company McGuire Nuclear Station Catawba Nuclear Station Nuclear Physics Methodology for Reload Design."

Revision 2

SER Date: June 24, 2003

15. DPC-NE-2011PA, "Duke Power Company Nuclear Design Methodology for Core Operating Limits of Westinghouse Reactors," (DPC Proprietary).

Revision 1

SER Date: October 1, 2002

16. DPC-NE-1005-P-A, "Nuclear Design Methodology Using CASMO-4 / SIMULATE-3 MOX," (DPC Proprietary).

Revision 0

SER Date: August 20, 2004

## McGuire 1 Cycle 20 Core Operating Limits Report

### 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 NRC approved methodologies specified in Section 1.1.

#### 2.1 Requirements for Operational Mode 6

The following condition is required for operational mode 6.

- 2.1.1 The Reactivity Condition requirement for operational mode 6 is that  $k_{\text{eff}}$  must be less than, or equal to 0.95.

#### 2.2 Reactor Core Safety Limits (TS 2.1.1)

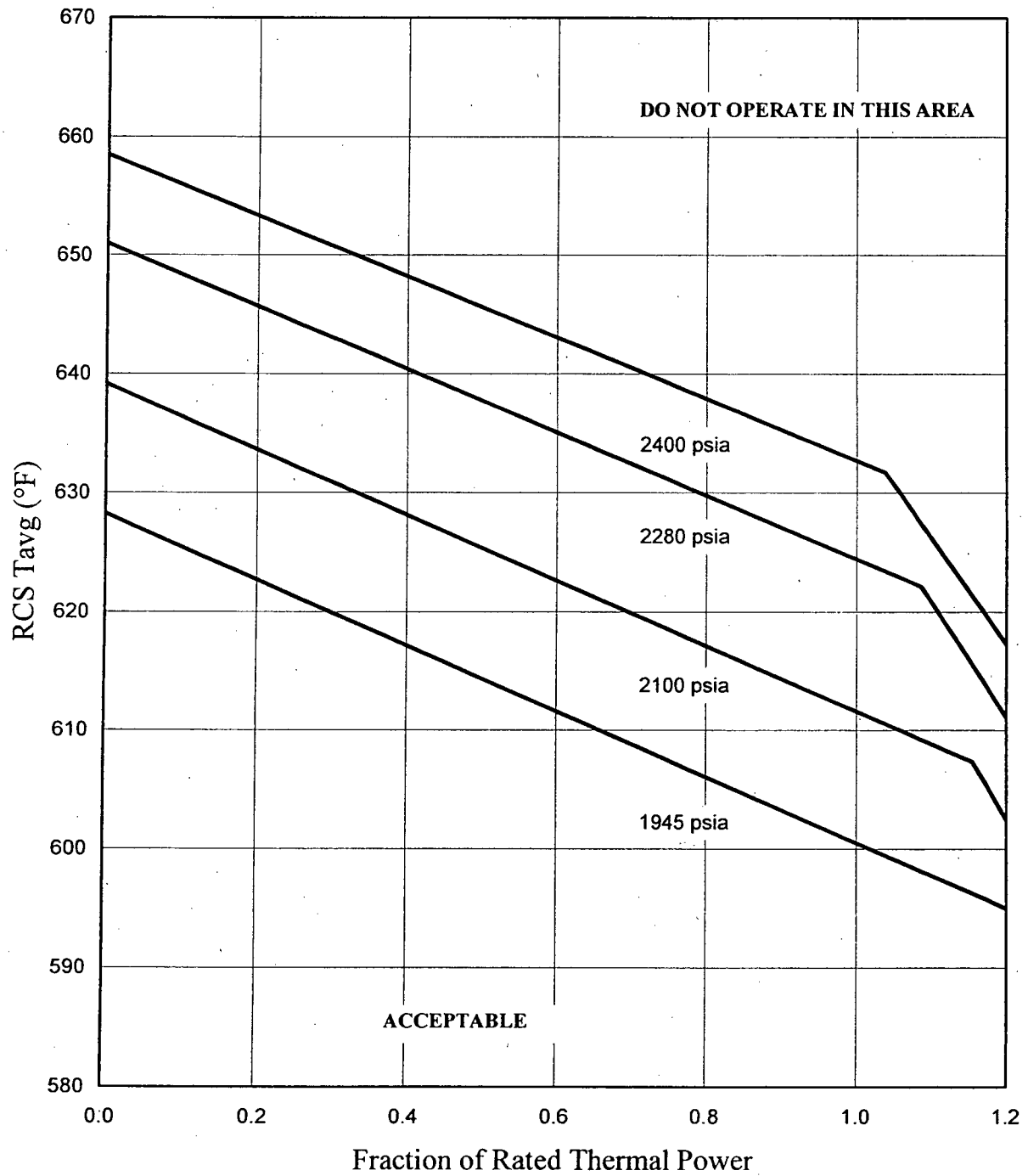
- 2.2.1 The Reactor Core Safety Limits are shown in Figure 1.

#### 2.3 Shutdown Margin - SDM (TS 3.1.1, TS 3.1.4, TS 3.1.5, TS 3.1.6 and TS 3.1.8)

- 2.3.1 For TS 3.1.1, SDM shall be  $\geq 1.3\% \Delta K/K$  in mode 2 with  $k_{\text{eff}} < 1.0$  and in modes 3 and 4.
- 2.3.2 For TS 3.1.1, SDM shall be  $\geq 1.0\% \Delta K/K$  in mode 5.
- 2.3.3 For TS 3.1.4, SDM shall be  $\geq 1.3\% \Delta K/K$  in modes 1 and 2.
- 2.3.4 For TS 3.1.5, SDM shall be  $\geq 1.3\% \Delta K/K$  in mode 1 and mode 2 with any control bank not fully inserted.
- 2.3.5 For TS 3.1.6, SDM shall be  $\geq 1.3\% \Delta K/K$  in mode 1 and mode 2 with  $K_{\text{eff}} \geq 1.0$ .
- 2.3.6 For TS 3.1.8, SDM shall be  $\geq 1.3\% \Delta K/K$  in mode 2 during Physics Testing.

**McGuire 1 Cycle 20 Core Operating Limits Report**

**Figure 1**  
**Reactor Core Safety Limits**  
**Four Loops in Operation**



## McGuire 1 Cycle 20 Core Operating Limits Report

### 2.4 Moderator Temperature Coefficient - MTC (TS 3.1.3)

#### 2.4.1 The Moderator Temperature Coefficient (MTC) Limits are:

The MTC shall be less positive than the upper limits shown in Figure 2. The BOC, ARO, HZP MTC shall be less positive than  $0.7\text{E-}04 \Delta\text{K/K/}^\circ\text{F}$ .

The EOC, ARO, RTP MTC shall be less negative than the  $-4.3\text{E-}04 \Delta\text{K/K/}^\circ\text{F}$  lower MTC limit.

#### 2.4.2 The 300 PPM MTC Surveillance Limit is:

The measured 300 PPM ARO, equilibrium RTP MTC shall be less negative than or equal to  $-3.65\text{E-}04 \Delta\text{K/K/}^\circ\text{F}$ .

#### 2.4.3 The 60 PPM MTC Surveillance Limit is:

The 60 PPM ARO, equilibrium RTP MTC shall be less negative than or equal to  $-4.125\text{E-}04 \Delta\text{K/K/}^\circ\text{F}$ .

Where,

BOC = Beginning of Cycle (Burnup corresponding to the most positive MTC.)

EOC = End of Cycle

ARO = All Rods Out

HZP = Hot Zero Power

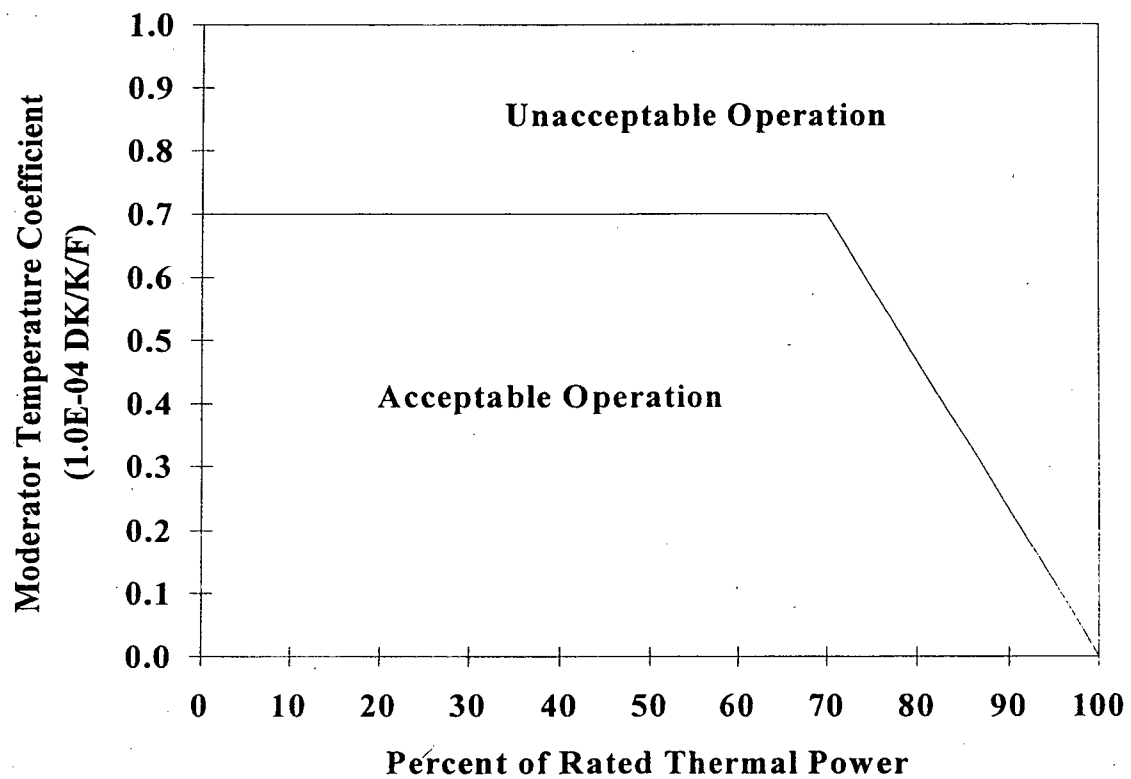
RTP = Rated Thermal Power

PPM = Parts per million (Boron)

### 2.5 Shutdown Bank Insertion Limit (TS 3.1.5)

2.5.1 Each shutdown bank shall be withdrawn to at least 222 steps except under the conditions listed in Section 2.5.2. Shutdown banks are withdrawn in sequence and with no overlap.

2.5.2 Shutdown banks may be inserted to 219 steps withdrawn individually for up to 48 hours provided the plant was operated in steady state conditions near 100% FP prior to and during this exception.

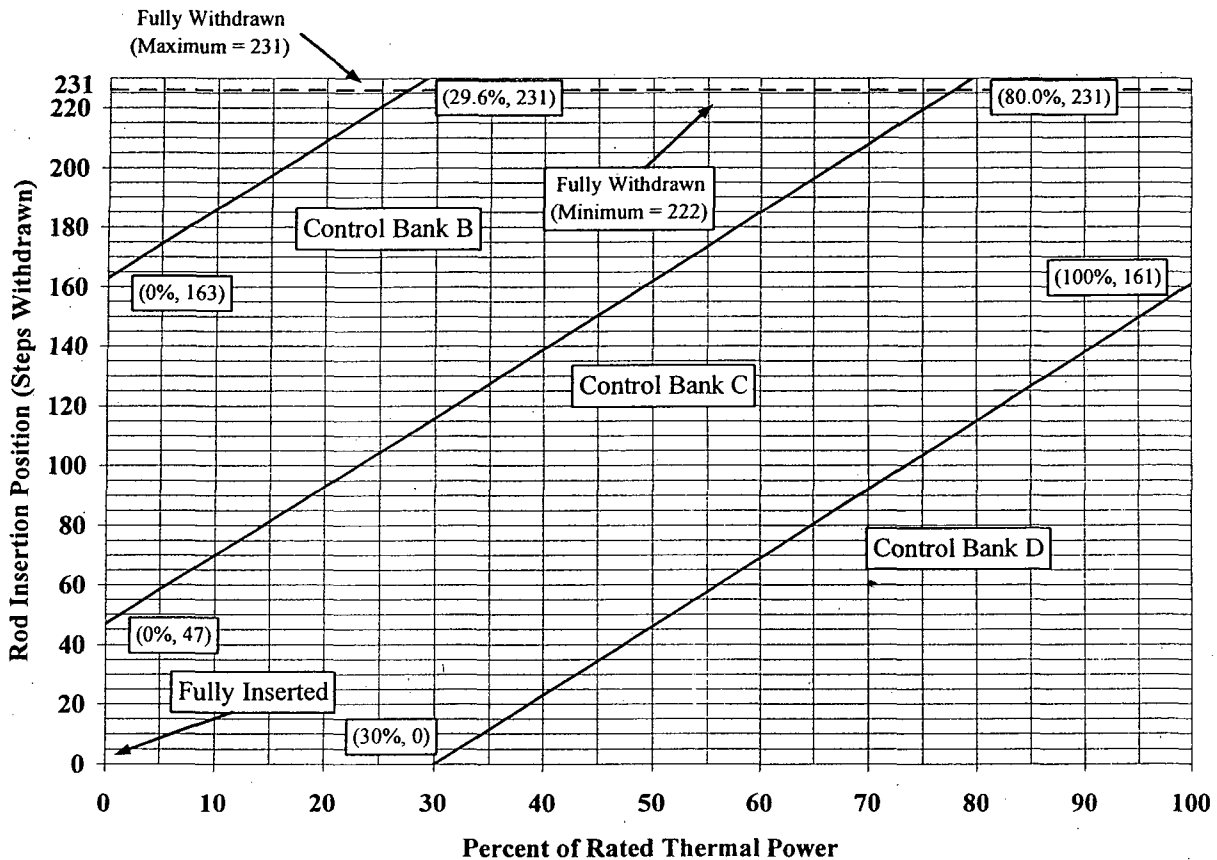
**McGuire 1 Cycle 20 Core Operating Limits Report****Figure 2****Moderator Temperature Coefficient Upper Limit Versus Power Level**

**NOTE:** Compliance with Technical Specification 3.1.3 may require rod withdrawal limits.  
Refer to OP/1/A/6100/22 Unit 1 Data Book for details.

# McGuire 1 Cycle 20 Core Operating Limits Report

## Figure 3

### Control Bank Insertion Limits Versus Percent Rated Thermal Power



The Rod Insertion Limits (RIL) for Control Bank D (CD), Control Bank C (CC), and Control Bank B (CB) can be calculated by:

$$\text{Bank CD RIL} = 2.3(P) - 69 \quad \{30 \leq P \leq 100\}$$

$$\text{Bank CC RIL} = 2.3(P) + 47 \quad \{0 \leq P \leq 80\}$$

$$\text{Bank CB RIL} = 2.3(P) + 163 \quad \{0 \leq P \leq 29.6\}$$

where  $P = \% \text{ Rated Thermal Power}$

**NOTES:** (1) Compliance with Technical Specification 3.1.3 may require rod withdrawal limits. Refer to OP/1/A/6100/22 Unit 1 Data Book for details.

(2) Anytime any shutdown bank or control banks A, B, or C are inserted below 222 steps withdrawn, control bank D insertion is limited to  $\geq 200$  steps withdrawn (see Sections 2.5.2 and 2.6.2)

# McGuire 1 Cycle 20 Core Operating Limits Report

## Table 1 RCCA Withdrawal Steps and Sequence

| Fully Withdrawn at 222 Steps |                |                |                | Fully Withdrawn at 223 Steps |                |                |                |
|------------------------------|----------------|----------------|----------------|------------------------------|----------------|----------------|----------------|
| Control Bank A               | Control Bank B | Control Bank C | Control Bank D | Control Bank A               | Control Bank B | Control Bank C | Control Bank D |
| 0 Start                      | 0              | 0              | 0              | 0 Start                      | 0              | 0              | 0              |
| 116                          | 0 Start        | 0              | 0              | 116                          | 0 Start        | 0              | 0              |
| 222 Stop                     | 106            | 0              | 0              | 223 Stop                     | 107            | 0              | 0              |
| 222                          | 116            | 0 Start        | 0              | 223                          | 116            | 0 Start        | 0              |
| 222                          | 222 Stop       | 106            | 0              | 223                          | 223 Stop       | 107            | 0              |
| 222                          | 222            | 116            | 0 Start        | 223                          | 223            | 116            | 0 Start        |
| 222                          | 222            | 222 Stop       | 106            | 223                          | 223            | 223 Stop       | 107            |

| Fully Withdrawn at 224 Steps |                |                |                | Fully Withdrawn at 225 Steps |                |                |                |
|------------------------------|----------------|----------------|----------------|------------------------------|----------------|----------------|----------------|
| Control Bank A               | Control Bank B | Control Bank C | Control Bank D | Control Bank A               | Control Bank B | Control Bank C | Control Bank D |
| 0 Start                      | 0              | 0              | 0              | 0 Start                      | 0              | 0              | 0              |
| 116                          | 0 Start        | 0              | 0              | 116                          | 0 Start        | 0              | 0              |
| 224 Stop                     | 108            | 0              | 0              | 225 Stop                     | 109            | 0              | 0              |
| 224                          | 116            | 0 Start        | 0              | 225                          | 116            | 0 Start        | 0              |
| 224                          | 224 Stop       | 108            | 0              | 225                          | 225 Stop       | 109            | 0              |
| 224                          | 224            | 116            | 0 Start        | 225                          | 225            | 116            | 0 Start        |
| 224                          | 224            | 224 Stop       | 108            | 225                          | 225            | 225 Stop       | 109            |

| Fully Withdrawn at 226 Steps |                |                |                | Fully Withdrawn at 227 Steps |                |                |                |
|------------------------------|----------------|----------------|----------------|------------------------------|----------------|----------------|----------------|
| Control Bank A               | Control Bank B | Control Bank C | Control Bank D | Control Bank A               | Control Bank B | Control Bank C | Control Bank D |
| 0 Start                      | 0              | 0              | 0              | 0 Start                      | 0              | 0              | 0              |
| 116                          | 0 Start        | 0              | 0              | 116                          | 0 Start        | 0              | 0              |
| 226 Stop                     | 110            | 0              | 0              | 227 Stop                     | 111            | 0              | 0              |
| 226                          | 116            | 0 Start        | 0              | 227                          | 116            | 0 Start        | 0              |
| 226                          | 226 Stop       | 110            | 0              | 227                          | 227 Stop       | 111            | 0              |
| 226                          | 226            | 116            | 0 Start        | 227                          | 227            | 116            | 0 Start        |
| 226                          | 226            | 226 Stop       | 110            | 227                          | 227            | 227 Stop       | 111            |

| Fully Withdrawn at 228 Steps |                |                |                | Fully Withdrawn at 229 Steps |                |                |                |
|------------------------------|----------------|----------------|----------------|------------------------------|----------------|----------------|----------------|
| Control Bank A               | Control Bank B | Control Bank C | Control Bank D | Control Bank A               | Control Bank B | Control Bank C | Control Bank D |
| 0 Start                      | 0              | 0              | 0              | 0 Start                      | 0              | 0              | 0              |
| 116                          | 0 Start        | 0              | 0              | 116                          | 0 Start        | 0              | 0              |
| 228 Stop                     | 112            | 0              | 0              | 229 Stop                     | 113            | 0              | 0              |
| 228                          | 116            | 0 Start        | 0              | 229                          | 116            | 0 Start        | 0              |
| 228                          | 228 Stop       | 112            | 0              | 229                          | 229 Stop       | 113            | 0              |
| 228                          | 228            | 116            | 0 Start        | 229                          | 229            | 116            | 0 Start        |
| 228                          | 228            | 228 Stop       | 112            | 229                          | 229            | 229 Stop       | 113            |

| Fully Withdrawn at 230 Steps |                |                |                | Fully Withdrawn at 231 Steps |                |                |                |
|------------------------------|----------------|----------------|----------------|------------------------------|----------------|----------------|----------------|
| Control Bank A               | Control Bank B | Control Bank C | Control Bank D | Control Bank A               | Control Bank B | Control Bank C | Control Bank D |
| 0 Start                      | 0              | 0              | 0              | 0 Start                      | 0              | 0              | 0              |
| 116                          | 0 Start        | 0              | 0              | 116                          | 0 Start        | 0              | 0              |
| 230 Stop                     | 114            | 0              | 0              | 231 Stop                     | 115            | 0              | 0              |
| 230                          | 116            | 0 Start        | 0              | 231                          | 116            | 0 Start        | 0              |
| 230                          | 230 Stop       | 114            | 0              | 231                          | 231 Stop       | 115            | 0              |
| 230                          | 230            | 116            | 0 Start        | 231                          | 231            | 116            | 0 Start        |
| 230                          | 230            | 230 Stop       | 114            | 231                          | 231            | 231 Stop       | 115            |



## McGuire 1 Cycle 20 Core Operating Limits Report

### 2.6 Control Bank Insertion Limits (TS 3.1.6)

**2.6.1** Control banks shall be within the insertion, sequence, and overlap limits shown in Figure 3 except under the conditions listed in Section 2.6.2. Specific control bank withdrawal and overlap limits as a function of the fully withdrawn position are shown in Table 1.

**2.6.2** Control banks A, B, or C may be inserted to 219 steps withdrawn individually for up to 48 hours provided the plant was operated in steady state conditions near 100% FP prior to and during this exception.

### 2.7 Heat Flux Hot Channel Factor - $F_Q(X,Y,Z)$ (TS 3.2.1)

**2.7.1**  $F_Q(X,Y,Z)$  steady-state limits are defined by the following relationships:

$$\begin{aligned} F_Q^{RTP} * K(Z) / P & \quad \text{for } P > 0.5 \\ F_Q^{RTP} * K(Z) / 0.5 & \quad \text{for } P \leq 0.5 \end{aligned}$$

where,

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

Note: The measured  $F_Q(X,Y,Z)$  shall be increased by 3% to account for manufacturing tolerances and 5% to account for measurement uncertainty when comparing against LCO limits. The manufacturing tolerance and measurement uncertainty are implicitly included in the  $F_Q$  surveillance limits as defined in COLR Sections 2.7.5 and 2.7.6.

**2.7.2**  $F_Q^{RTP} = 2.60 \times K(\text{BU})$

**2.7.3**  $K(Z)$  is the normalized  $F_Q(X,Y,Z)$  as a function of core height. The  $K(Z)$  function for Westinghouse RFA fuel is provided in Figure 4.

**2.7.4**  $K(\text{BU})$  is the normalized  $F_Q(X,Y,Z)$  as a function of burnup.  $K(\text{BU})$  for Westinghouse RFA fuel is 1.0 for all burnups.

The following parameters are required for core monitoring per the Surveillance Requirements of Technical Specification 3.2.1:

**2.7.5**  $F_Q^L(X,Y,Z)^{OP} = \frac{F_Q^D(X,Y,Z) * M_Q(X,Y,Z)}{UMT * MT * TILT}$

## McGuire 1 Cycle 20 Core Operating Limits Report

where:

$F_Q^L(X,Y,Z)^{OP} =$  Cycle dependent maximum allowable design peaking factor that ensures that the  $F_Q(X,Y,Z)$  LOCA limit will be preserved for operation within the LCO limits.  $F_Q^L(X,Y,Z)^{OP}$  includes allowances for calculation and measurement uncertainties.

$F_Q^D(X,Y,Z) =$  Design power distribution for  $F_Q$ .  $F_Q^D(X,Y,Z)$  is provided in Appendix A-1 for normal operating conditions and in Appendix Table A-4 for power escalation testing during initial startup operation.

$M_Q(X,Y,Z) =$  Margin remaining in core location X,Y,Z to the LOCA limit in the transient power distribution.  $M_Q(X,Y,Z)$  is provided in Appendix Table A-1 for normal operating conditions and in Appendix Table A-4 for power escalation testing during initial startup operation.

UMT = Total Peak Measurement Uncertainty. (UMT = 1.05)

MT = Engineering Hot Channel Factor. (MT = 1.03)

TILT = Peaking penalty that accounts for the peaking increase from an allowable quadrant power tilt ratio of 1.02. (TILT = 1.035)

$$2.7.6 \quad F_Q^L(X,Y,Z)^{RPS} = \frac{F_Q^D(X,Y,Z) * M_C(X,Y,Z)}{UMT * MT * TILT}$$

where:

$F_Q^L(X,Y,Z)^{RPS} =$  Cycle dependent maximum allowable design peaking factor that ensures that the  $F_Q(X,Y,Z)$  Centerline Fuel Melt (CFM) limit will be preserved for operation within the LCO limits.  $F_Q^L(X,Y,Z)^{RPS}$  includes allowances for calculation and measurement uncertainties.

$F_Q^D(X,Y,Z) =$  Design power distributions for  $F_Q$ .  $F_Q^D(X,Y,Z)$  is provided in Appendix Table A-1 for normal operating conditions and in Appendix Table A-4 for power escalation testing during initial startup operation.

### McGuire 1 Cycle 20 Core Operating Limits Report

$M_C(X,Y,Z)$  = Margin remaining to the CFM limit in core location X,Y,Z from the transient power distribution.  $M_C(X,Y,Z)$  is provided in Appendix Table A-2 for normal operating conditions and in Appendix Table A-5 for power escalation testing during initial startup operation.

UMT = Total Peak Measurement Uncertainty (UMT = 1.05)

MT = Engineering Hot Channel Factor (MT = 1.03)

TILT = Peaking penalty that accounts for the peaking increase for an allowable quadrant power tilt ratio of 1.02. (TILT = 1.035)

#### 2.7.7 KSLOPE = 0.0725

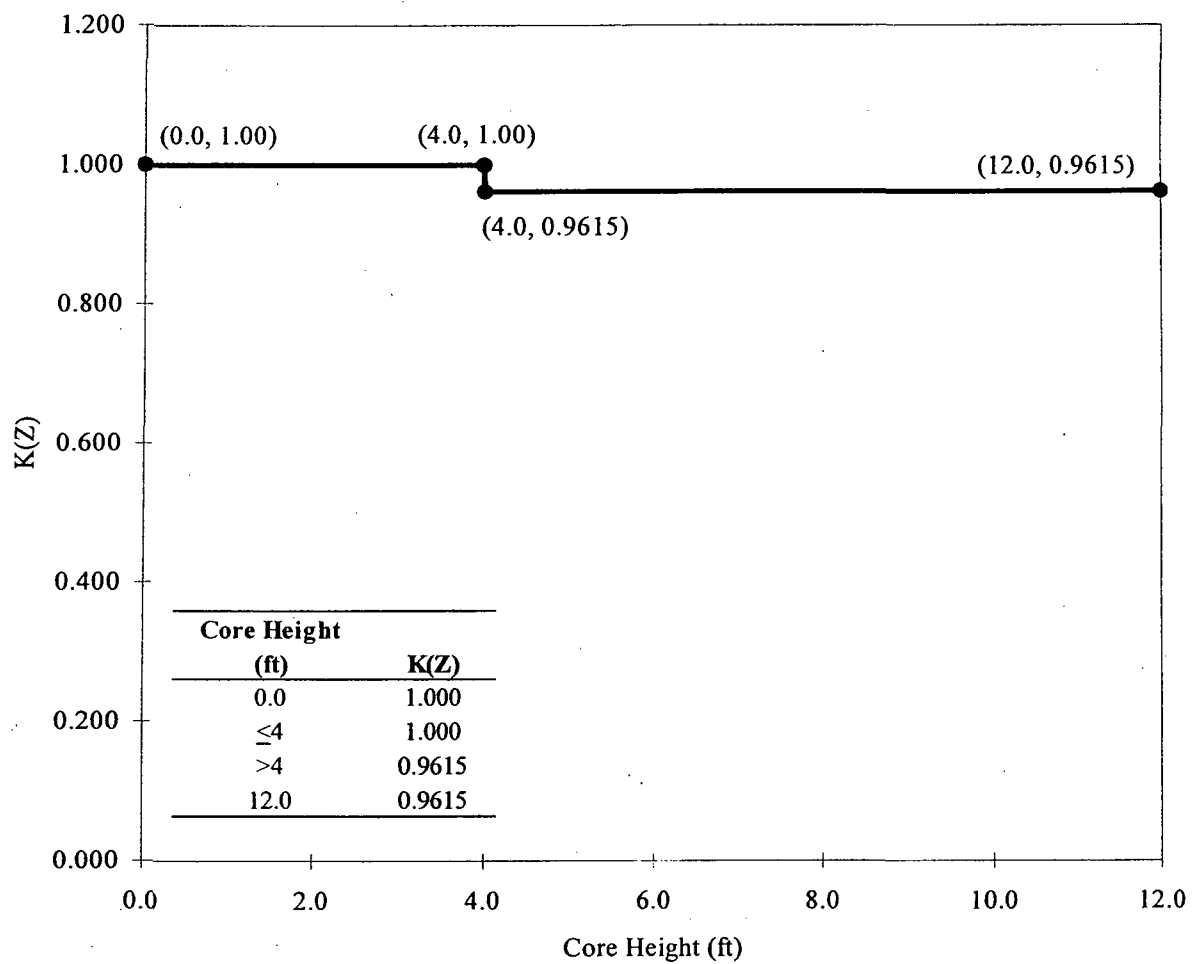
where:

KSLOPE is the adjustment to the  $K_1$  value from OTΔT trip setpoint required to compensate for each 1% that  $F_Q^M(X,Y,Z)$  exceeds  $F_Q^L(X,Y,Z)^{RPS}$ .

#### 2.7.8 $F_Q(X,Y,Z)$ penalty factors for Technical Specification Surveillance's 3.2.1.2 and 3.2.1.3 are provided in Table 2.

**McGuire 1 Cycle 20 Core Operating Limits Report****Figure 4**

**$K(Z)$ , Normalized  $F_Q(X,Y,Z)$  as a Function of  
Core Height for Westinghouse RFA Fuel**



# McGuire 1 Cycle 20 Core Operating Limits Report

**Table 2**  
 **$F_Q(X,Y,Z)$  and  $F_{\Delta H}(X,Y)$  Penalty Factors**  
**For Technical Specification Surveillance's 3.2.1.2, 3.2.1.3 and 3.2.2.2**

| <b><u>Burnup</u></b><br><b><u>(EFPD)</u></b> | <b><u><math>F_Q(X,Y,Z)</math></u></b><br><b><u>Penalty Factor (%)</u></b> | <b><u><math>F_{\Delta H}(X,Y,Z)</math></u></b><br><b><u>Penalty Factor (%)</u></b> |
|--|---|--|
| 0  | 2.00  | 2.00   |
| 4  | 2.00  | 2.00   |
| 12   | 2.00  | 2.00   |
| 25   | 2.00  | 2.00   |
| 50   | 2.47  | 2.00   |
| 75   | 2.00  | 2.00   |
| 100  | 2.00  | 2.00   |
| 125  | 2.00  | 2.00   |
| 150  | 2.00  | 2.00   |
| 175  | 2.00  | 2.00   |
| 200  | 2.00  | 2.00   |
| 225  | 2.00  | 2.00   |
| 250  | 2.00  | 2.00   |
| 275  | 2.00  | 2.00   |
| 300  | 2.00  | 2.00   |
| 325  | 2.00  | 2.00   |
| 350  | 2.00  | 2.00   |
| 375  | 2.00  | 2.00   |
| 400  | 2.00  | 2.00   |
| 425  | 2.00  | 2.00   |
| 440  | 2.00  | 2.00   |
| 465  | 2.00  | 2.00   |
| 483  | 2.00  | 2.00   |
| 498  | 2.00  | 2.00   |
| 513  | 2.00  | 2.00   |

**Note:** Linear interpolation is adequate for intermediate cycle burnups. All cycle burnups outside of the range of the table shall use a 2% penalty factor for both  $F_Q(X,Y,Z)$  and  $F_{\Delta H}(X,Y)$  for compliance with the Technical Specification Surveillances 3.2.1.2, 3.2.1.3 and 3.2.2.2.

## McGuire 1 Cycle 20 Core Operating Limits Report

### 2.8 Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}(X,Y)$ (TS 3.2.2)

The  $F_{\Delta H}$  steady-state limits referred to in Technical Specification 3.2.2 is defined by the following relationship.

$$2.8.1 \quad F_{\Delta H}^L(X,Y)^{LCO} = \text{MARP}(X,Y) * \left[ 1.0 + \frac{1}{\text{RRH}} * (1.0 - P) \right]$$

where:

$F_{\Delta H}^L(X,Y)^{LCO}$  is defined as the steady-state, maximum allowed radial peak.

$F_{\Delta H}^L(X,Y)^{LCO}$  includes allowances for calculation-measurement uncertainty.

$\text{MARP}(X,Y)$  = Cycle-specific operating limit Maximum Allowable Radial Peaks.  $\text{MARP}(X,Y)$  radial peaking limits are provided in Table 3.

$$P = \frac{\text{Thermal Power}}{\text{Rated Thermal Power}}$$

$\text{RRH}$  = Thermal Power reduction required to compensate for each 1% that the measured radial peak,  $F_{\Delta H}^M(X,Y)$ , exceeds the limit.  $\text{RRH}$  also is used to scale the  $\text{MARP}$  limits as a function of power per the  $F_{\Delta H}^L(X,Y)^{LCO}$  equation. ( $\text{RRH} = 3.34$  ( $0.0 < P \leq 1.0$ ))

The following parameters are required for core monitoring per the Surveillance requirements of Technical Specification 3.2.2.

$$2.8.2 \quad F_{\Delta H}^L(X,Y)^{SURV} = \frac{F_{\Delta H}^D(X,Y) \times M_{\Delta H}(X,Y)}{\text{UMR} \times \text{TILT}}$$

where:

$F_{\Delta H}^L(X,Y)^{SURV}$  = Cycle dependent maximum allowable design peaking factor that ensures that the  $F_{\Delta H}(X,Y)$  limit will be preserved for operation within the LCO limits.  $F_{\Delta H}^L(X,Y)^{SURV}$  includes allowances for calculation-measurement uncertainty.

## McGuire 1 Cycle 20 Core Operating Limits Report

$F_{\Delta H}^D(X,Y)$  = Design radial power distribution for  $F_{\Delta H}$ .  $F_{\Delta H}^D(X,Y)$  is provided in Appendix Table A-3 for normal operation and in Appendix Table A-6 for power escalation testing during initial startup operation.

$M_{\Delta H}(X,Y)$  = The margin remaining in core location X,Y relative to the Operational DNB limits in the transient power distribution.  $M_{\Delta H}(X,Y)$  is provided in Appendix Table A-3 for normal operation and in Appendix Table A-6 for power escalation testing during initial startup operation.

UMR = Uncertainty value for measured radial peaks. UMR is set to 1.0 since a factor of 1.04 is implicitly included in the variable  $M_{\Delta H}(X,Y)$ .

TILT = Peaking penalty that accounts for the peaking increase for an allowable quadrant power tilt ratio of 1.02, (TILT = 1.035).

### 2.8.3 $RRH = 3.34$

where:

$RRH$  = Thermal power reduction required to compensate for each 1% that the measured radial peak,  $F_{\Delta H}^M(X,Y)$  exceeds its limit. ( $0 < P \leq 1.0$ )

### 2.8.4 $TRH = 0.04$

where:

$TRH$  = Reduction in  $OT\Delta T K_1$  setpoint required to compensate for each 1% that the measured radial peak,  $F_{\Delta H}^M(X,Y)$  exceeds its limit.

2.8.5  $F_{\Delta H}(X,Y)$  penalty factors for Technical Specification Surveillance 3.2.2.2 are provided in Table 2.

## 2.9 Axial Flux Difference – AFD (TS 3.2.3)

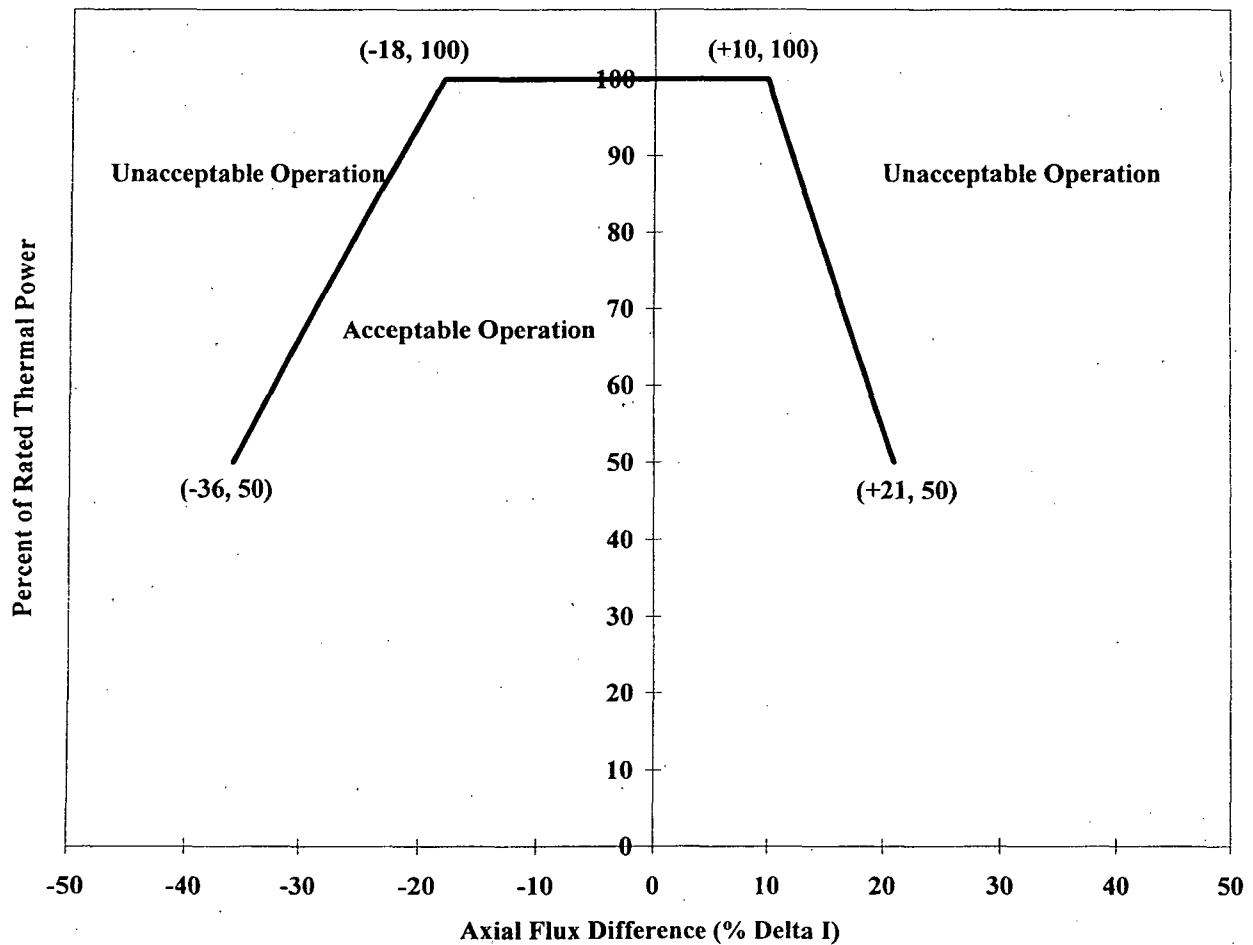
2.9.1 The Axial Flux Difference (AFD) Limits are provided in Figure 5.

**McGuire 1 Cycle 20 Core Operating Limits Report**

**Table 3**  
**Maximum Allowable Radial Peaks (MARPs)**  
**(Applicable for RFA Fuel)**

| <b>Core<br/>Ht (ft.)</b> | <b>Axial Peak</b>  |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |                   |                    |
|--------------------------|--------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|--------------------|
|                          | <b><u>1.05</u></b> | <b><u>1.1</u></b> | <b><u>1.2</u></b> | <b><u>1.3</u></b> | <b><u>1.4</u></b> | <b><u>1.5</u></b> | <b><u>1.6</u></b> | <b><u>1.7</u></b> | <b><u>1.8</u></b> | <b><u>1.9</u></b> | <b><u>2.1</u></b> | <b><u>3.0</u></b> | <b><u>3.25</u></b> |
| <b>0.12</b>              | 1.809              | 1.855             | 1.949             | 1.995             | 1.974             | 2.107             | 2.050             | 2.009             | 1.933             | 1.863             | 1.778             | 1.315             | 1.246              |
| <b>1.2</b>               | 1.810              | 1.854             | 1.940             | 1.995             | 1.974             | 2.107             | 2.019             | 1.978             | 1.901             | 1.831             | 1.785             | 1.301             | 1.224              |
| <b>2.4</b>               | 1.809              | 1.853             | 1.931             | 1.978             | 1.974             | 2.074             | 1.995             | 1.952             | 1.876             | 1.805             | 1.732             | 1.463             | 1.462              |
| <b>3.6</b>               | 1.810              | 1.851             | 1.920             | 1.964             | 1.974             | 2.050             | 1.966             | 1.926             | 1.852             | 1.786             | 1.700             | 1.468             | 1.387              |
| <b>4.8</b>               | 1.810              | 1.851             | 1.906             | 1.945             | 1.974             | 2.006             | 1.944             | 1.923             | 1.854             | 1.784             | 1.671             | 1.299             | 1.258              |
| <b>6.0</b>               | 1.810              | 1.851             | 1.892             | 1.921             | 1.946             | 1.934             | 1.880             | 1.863             | 1.802             | 1.747             | 1.671             | 1.329             | 1.260              |
| <b>7.2</b>               | 1.807              | 1.844             | 1.872             | 1.893             | 1.887             | 1.872             | 1.809             | 1.787             | 1.733             | 1.681             | 1.598             | 1.287             | 1.220              |
| <b>8.4</b>               | 1.807              | 1.832             | 1.845             | 1.857             | 1.816             | 1.795             | 1.736             | 1.709             | 1.654             | 1.601             | 1.513             | 1.218             | 1.158              |
| <b>9.6</b>               | 1.807              | 1.810             | 1.809             | 1.791             | 1.738             | 1.718             | 1.657             | 1.635             | 1.581             | 1.530             | 1.444             | 1.143             | 1.091              |
| <b>10.8</b>              | 1.798              | 1.787             | 1.761             | 1.716             | 1.654             | 1.632             | 1.574             | 1.557             | 1.509             | 1.462             | 1.383             | 1.101             | 1.047              |
| <b>11.4</b>              | 1.789              | 1.765             | 1.725             | 1.665             | 1.606             | 1.583             | 1.529             | 1.510             | 1.464             | 1.422             | 1.346             | 1.067             | 1.014              |



**McGuire 1 Cycle 20 Core Operating Limits Report****Figure 5****Percent of Rated Thermal Power Versus Percent Axial Flux Difference Limits**

**NOTE:** Compliance with Technical Specification 3.2.1 may require more restrictive AFD limits. Refer to OP/1/A/6100/22 Unit 1 Data Book of more details.

## McGuire 1 Cycle 20 Core Operating Limits Report

### 2.10 Reactor Trip System Instrumentation Setpoints (TS 3.3.1) Table 3.3.1-1

#### 2.10.1 Overtemperature $\Delta T$ Setpoint Parameter Values

| <u>Parameter</u>  | <u>Value</u>  |
|---|---|
| Nominal $T_{avg}$ at RTP  | $T' \leq 585.1^{\circ}\text{F}$                               |
| Nominal RCS Operating Pressure  | $P' = 2235 \text{ psig}$                                      |
| Overtemperature $\Delta T$ reactor trip setpoint                                      | $K_1 \leq 1.1978$   |
| Overtemperature $\Delta T$ reactor trip heatup setpoint penalty coefficient           | $K_2 = 0.0334/^{\circ}\text{F}$                               |
| Overtemperature $\Delta T$ reactor trip depressurization setpoint penalty coefficient | $K_3 = 0.001601/\text{psi}$                                   |
| Time constants utilized in the lead-lag compensator for $\Delta T$                    | $\tau_1 \geq 8 \text{ sec.}$<br>$\tau_2 \leq 3 \text{ sec.}$  |
| Time constant utilized in the lag compensator for $\Delta T$                          | $\tau_3 \leq 2 \text{ sec.}$                                  |
| Time constants utilized in the lead-lag compensator for $T_{avg}$                     | $\tau_4 \geq 28 \text{ sec.}$<br>$\tau_5 \leq 4 \text{ sec.}$ |
| Time constant utilized in the measured $T_{avg}$ lag compensator                      | $\tau_6 \leq 2 \text{ sec.}$                                  |
| $f_1(\Delta I)$ "positive" breakpoint   | $= 19.0 \% \Delta I$  |
| $f_1(\Delta I)$ "negative" breakpoint   | $= \text{N/A}^*$  |
| $f_1(\Delta I)$ "positive" slope  | $= 1.769 \% \Delta T_0 / \% \Delta I$                         |
| $f_1(\Delta I)$ "negative" slope  | $= \text{N/A}^*$  |

- \* The  $f_1(\Delta I)$  negative breakpoints and slopes for OTAT are less restrictive than the OPAT  $f_2(\Delta I)$  negative breakpoint and slope. Therefore, during a transient which challenges the negative imbalance limits the OPAT  $f_2(\Delta I)$  limits will result in a reactor trip before the OTAT  $f_1(\Delta I)$  limits are reached. This makes implementation of an OTAT  $f_1(\Delta I)$  negative breakpoint and slope unnecessary.

## McGuire 1 Cycle 20 Core Operating Limits Report

### 2.10.2 Overpower $\Delta T$ Setpoint Parameter Values

| <u>Parameter</u>  | <u>Value</u>   |
|---|--|
| Nominal $T_{avg}$ at RTP  | $T'' \leq 585.1^{\circ}\text{F}$   |
| Overpower $\Delta T$ reactor trip setpoint                            | $K_4 \leq 1.0864$  |
| Overpower $\Delta T$ reactor trip Penalty                             | $K_5 = 0.02/^{\circ}\text{F}$ for increasing $T_{avg}$<br>$K_5 = 0.0$ for decreasing $T_{avg}$ |
| Overpower $\Delta T$ reactor trip heatup setpoint penalty coefficient | $K_6 = 0.001179/^{\circ}\text{F}$ for $T > T''$<br>$K_6 = 0.0$ for $T \leq T''$                |
| Time constants utilized in the lead-lag compensator for $\Delta T$    | $\tau_1 \geq 8 \text{ sec.}$<br>$\tau_2 \leq 3 \text{ sec.}$                                   |
| Time constant utilized in the lag compensator for $\Delta T$          | $\tau_3 \leq 2 \text{ sec.}$   |
| Time constant utilized in the measured $T_{avg}$ lag compensator      | $\tau_6 \leq 2 \text{ sec.}$   |
| Time constant utilized in the rate-lag controller for $T_{avg}$       | $\tau_7 \geq 5 \text{ sec.}$   |
| $f_2(\Delta I)$ "positive" breakpoint                                 | $= 35.0 \% \Delta I$   |
| $f_2(\Delta I)$ "negative" breakpoint                                 | $= -35.0 \% \Delta I$  |
| $f_2(\Delta I)$ "positive" slope                                      | $= 7.0 \% \Delta T_0 / \% \Delta I$  |
| $f_2(\Delta I)$ "negative" slope                                      | $= 7.0 \% \Delta T_0 / \% \Delta I$  |

## McGuire 1 Cycle 20 Core Operating Limits Report

### 2.11 RCS Pressure, Temperature and Flow Limits for DNB (TS 3.4.1)

2.11.1 The RCS pressure, temperature and flow limits for DNB are shown in Table 4.

### 2.12 Accumulators (TS 3.5.1)

2.12.1 Boron concentration limits during modes 1 and 2, and mode 3 with RCS pressure >1000 psi:

| <u>Parameter</u>                                  | <u>Limit</u> |
|---|--------------|
| Cold Leg Accumulator minimum boron concentration. | 2,475 ppm    |
| Cold Leg Accumulator maximum boron concentration. | 2,875 ppm    |

### 2.13 Refueling Water Storage Tank - RWST (TS 3.5.4)

2.13.1 Boron concentration limits during modes 1, 2, 3, and 4:

| <u>Parameter</u>  | <u>Limit</u> |
|---|--------------|
| Refueling Water Storage Tank minimum boron concentration. | 2,675 ppm    |
| Refueling Water Storage Tank maximum boron concentration. | 2,875 ppm    |

**McGuire 1 Cycle 20 Core Operating Limits Report****Table 4****Reactor Coolant System DNB Parameters**

| PARAMETER                            | INDICATION | No. Operable<br>CHANNELS | LIMITS              |
|--------------------------------------|------------|--------------------------|---------------------|
| 1. Indicated RCS Average Temperature | meter      | 4                        | $\leq 587.2$ °F     |
|                                      | meter      | 3                        | $\leq 586.9$ °F     |
|                                      | computer   | 4                        | $\leq 587.7$ °F     |
|                                      | computer   | 3                        | $\leq 587.5$ °F     |
| 2. Indicated Pressurizer Pressure    | meter      | 4                        | $\geq 2219.8$ psig  |
|                                      | meter      | 3                        | $\geq 2222.1$ psig  |
|                                      | computer   | 4                        | $\geq 2215.8$ psig  |
|                                      | computer   | 3                        | $\geq 2217.5$ psig  |
| 3. RCS Total Flow Rate               |            |                          | $\geq 390,000$ gpm* |

\*Note: The RCS minimum coolant flow rate assumed in the licensing analyses for the M1C20 core is 388,000 gpm. However, the flow is set at 390,000 gpm, which is conservative

**McGuire 1 Cycle 20 Core Operating Limits Report****2.14 Spent Fuel Pool Boron Concentration (TS 3.7.14)**

**2.14.1** Minimum boron concentration limit for the spent fuel pool. Applicable when fuel assemblies are stored in the spent fuel pool.

| <u>Parameter</u>                             | <u>Limit</u> |
|--|--------------|
| Spent fuel pool minimum boron concentration. | 2,675 ppm    |

**2.15 Refueling Operations - Boron Concentration (TS 3.9.1)**

**2.15.1** Minimum boron concentration limit for the filled portions of the Reactor Coolant System, refueling canal, and refueling cavity for mode 6 conditions. The minimum boron concentration limit and plant refueling procedures ensure that the  $K_{eff}$  of the core will remain within the mode 6 reactivity requirement of  $K_{eff} \leq 0.95$ .

| <u>Parameter</u>  | <u>Limit</u> |
|---|--------------|
| Minimum Boron concentration of the Reactor Coolant System, the refueling canal, and the refueling cavity. | 2,675 ppm    |

**McGuire 1 Cycle 20 Core Operating Limits Report****2.16 Borated Water Source – Shutdown (SLC 16.9.14)**

**2.16.1** Volume and boron concentrations for the Boric Acid Tank (BAT) and the Refueling Water Storage Tank (RWST) during mode 4 with any RCS cold leg temperature  $\leq 300$  °F and modes 5 and 6.

| <u>Parameter</u>                                       | <u>Limit</u>                  |
|--|-------------------------------|
| Boric Acid Tank minimum contained borated water volume | 10,599 gallons<br>13.6% Level |

|  |
|--|
| Note: When cycle burnup is > 455 EFPD, Figure 6 may be used to determine the required BAT minimum level. |
|--|

|   |                             |
|---|-----------------------------|
| Boric Acid Tank minimum boron concentration   | 7,000 ppm                   |
| Boric Acid Tank minimum water volume required to maintain SDM at 7,000 ppm              | 2,300 gallons               |
| Refueling Water Storage Tank minimum contained borated water volume                     | 47,700 gallons<br>41 inches |
| Refueling Water Storage Tank minimum boron concentration                                | 2,675 ppm                   |
| Refueling Water Storage Tank minimum water volume required to maintain SDM at 2,675 ppm | 8,200 gallons               |

**McGuire 1 Cycle 20 Core Operating Limits Report****2.17 Borated Water Source - Operating (SLC 16.9.11)**

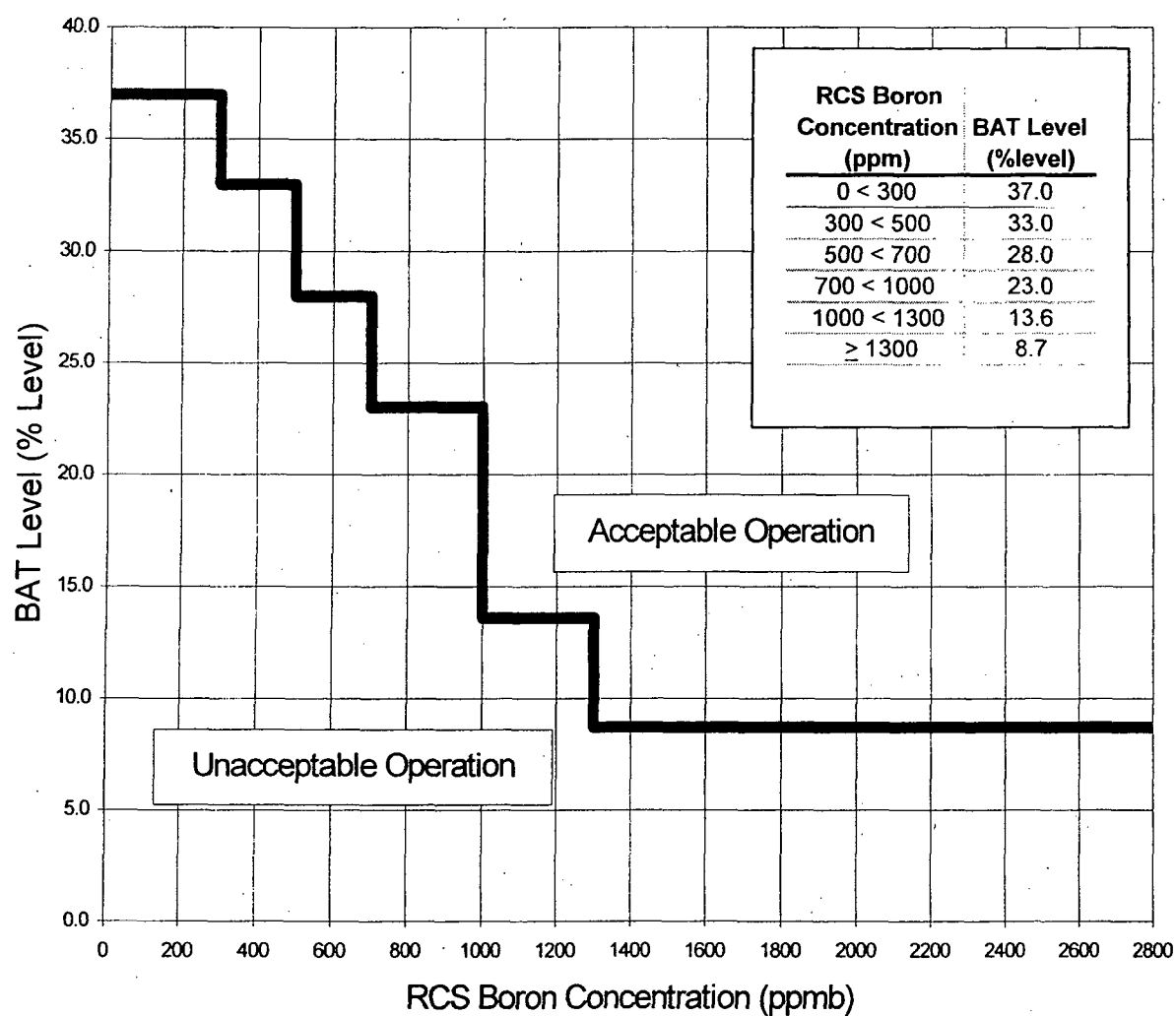
**2.17.1** Volume and boron concentrations for the Boric Acid Tank (BAT) and the Refueling Water Storage Tank (RWST) during modes 1, 2, 3, and mode 4 with all RCS cold leg temperatures > 300°F.

| <u>Parameter</u>                                       | <u>Limit</u>                  |
|--|-------------------------------|
| Boric Acid Tank minimum contained borated water volume | 22,049 gallons<br>38.0% Level |

|  |
|--|
| Note: When cycle burnup is > 455 EFPD, Figure 6 may be used to determine the required BAT minimum level. |
|--|

|   |                                |
|---|--------------------------------|
| Boric Acid Tank minimum boron concentration   | 7,000 ppm                      |
| Boric Acid Tank minimum water volume required to maintain SDM at 7,000 ppm              | 13,750 gallons                 |
| Refueling Water Storage Tank minimum contained borated water volume                     | 96,607 gallons<br>103.6 inches |
| Refueling Water Storage Tank minimum boron concentration                                | 2,675 ppm                      |
| Refueling Water Storage Tank maximum boron concentration (TS 3.5.4)                     | 2875 ppm                       |
| Refueling Water Storage Tank minimum water volume required to maintain SDM at 2,675 ppm | 57,107 gallons                 |



**McGuire 1 Cycle 20 Core Operating Limits Report****Figure 6****Boric Acid Storage Tank Indicated Level Versus  
RCS Boron Concentration****(Valid When Cycle Burnup is > 455 EFPD)****This figure includes additional volumes listed in SLC 16.9.14 and 16.9.11**

## McGuire 1 Cycle 20 Core Operating Limits Report

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**NOTE:** Appendix A contains power distribution monitoring factors used in Technical Specification Surveillance. This data was generated in the McGuire 1 Cycle 20 Maneuvering Analysis calculation file, MCC-1553.05-00-0481. Due to the size of the monitoring factor data, Appendix A is controlled electronically within Duke and is not included in the Duke internal copies of the COLR. The Plant Nuclear Engineering Section will control this information via computer file(s) and should be contacted if there is a need to access this information.

Appendix A is included in the COLR copy transmitted to the NRC.