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May 20, 2009

ULNRC-05632

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
CORE OPERATING LIMITS REPORT
Reference: ULNRC-05561, dated November 12, 2008

Attached is the Callaway Plant Cycle 17 Core Operating Limits Report (COLR), Revision 1. Revision 1 provides the COLR for use after implementation of revised setpoints from the Margin Recovery Program. Note that Revision 0 COLR was transmitted to NRC via the referenced letter. Revision 0 COLR was for use prior to implementation of revised setpoints from the Margin Recovery Program. The Revision 1 COLR report is provided to the NRC Staff for information. It has been prepared in accordance with the requirements of Technical Specification 5.6.5.

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

Sincerely,

Scott Sandbothe
Manager, Regulatory Affairs

DJW/nls

Attachment: Callaway Cycle 17 Core Operating Limits Report, Rev. 1

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Callaway Cycle 17

Core Operating Limits Report
Revision 1

September 2008

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Reviewed by: _____ / 5/18/09
Approved by: _____ / 5/14/09

1.0 CORE OPERATING LIMITS REPORT

This Core Operating Limits Report (COLR) for Callaway Plant Cycle 17 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% Δk/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% Δk/k as calculated at 200°F.

2.1.3 The Shutdown Margin in MODE 5 shall be greater than or equal to 1.0% Δk/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).

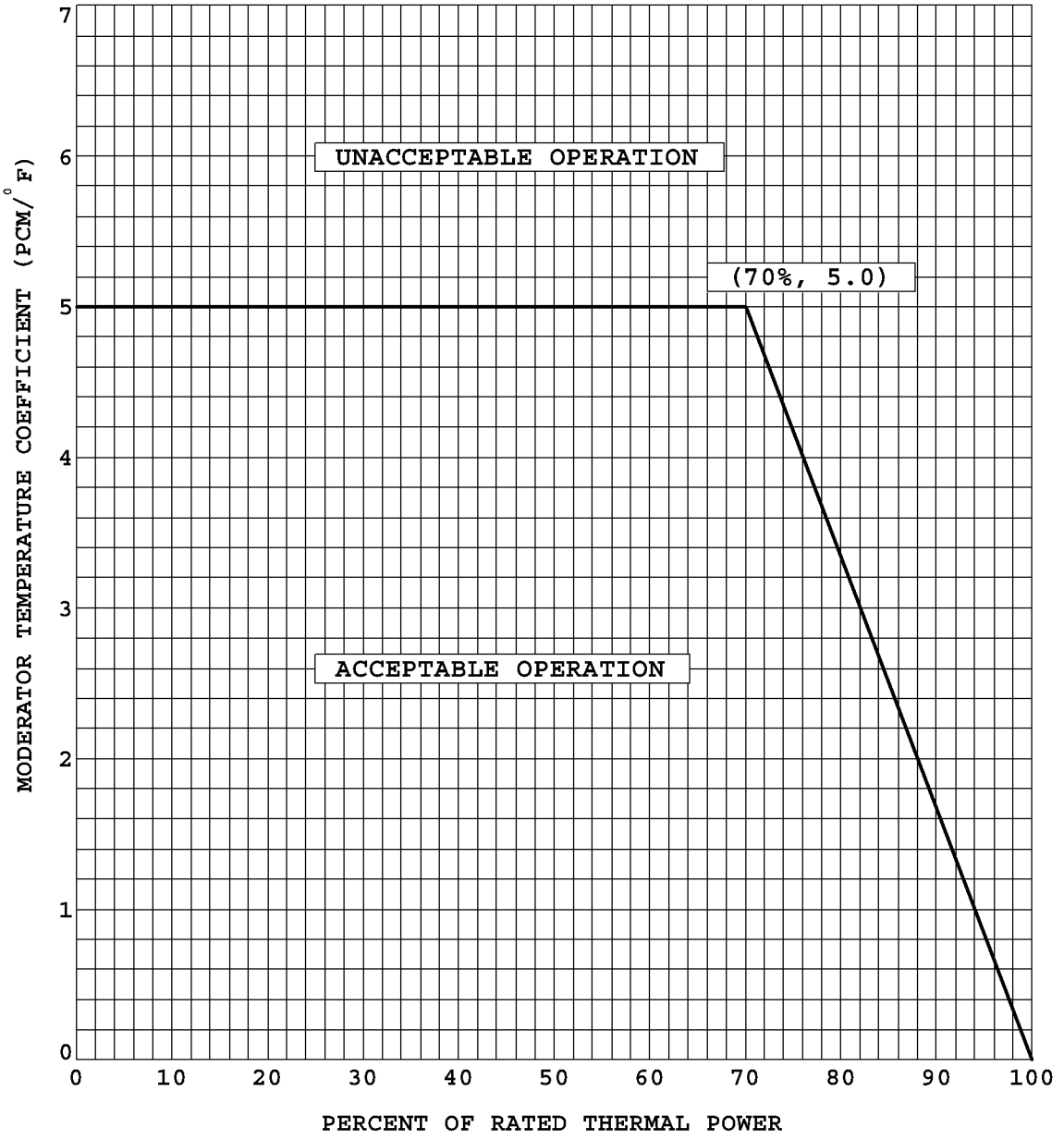

Figure 1

Callaway Cycle 17
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.

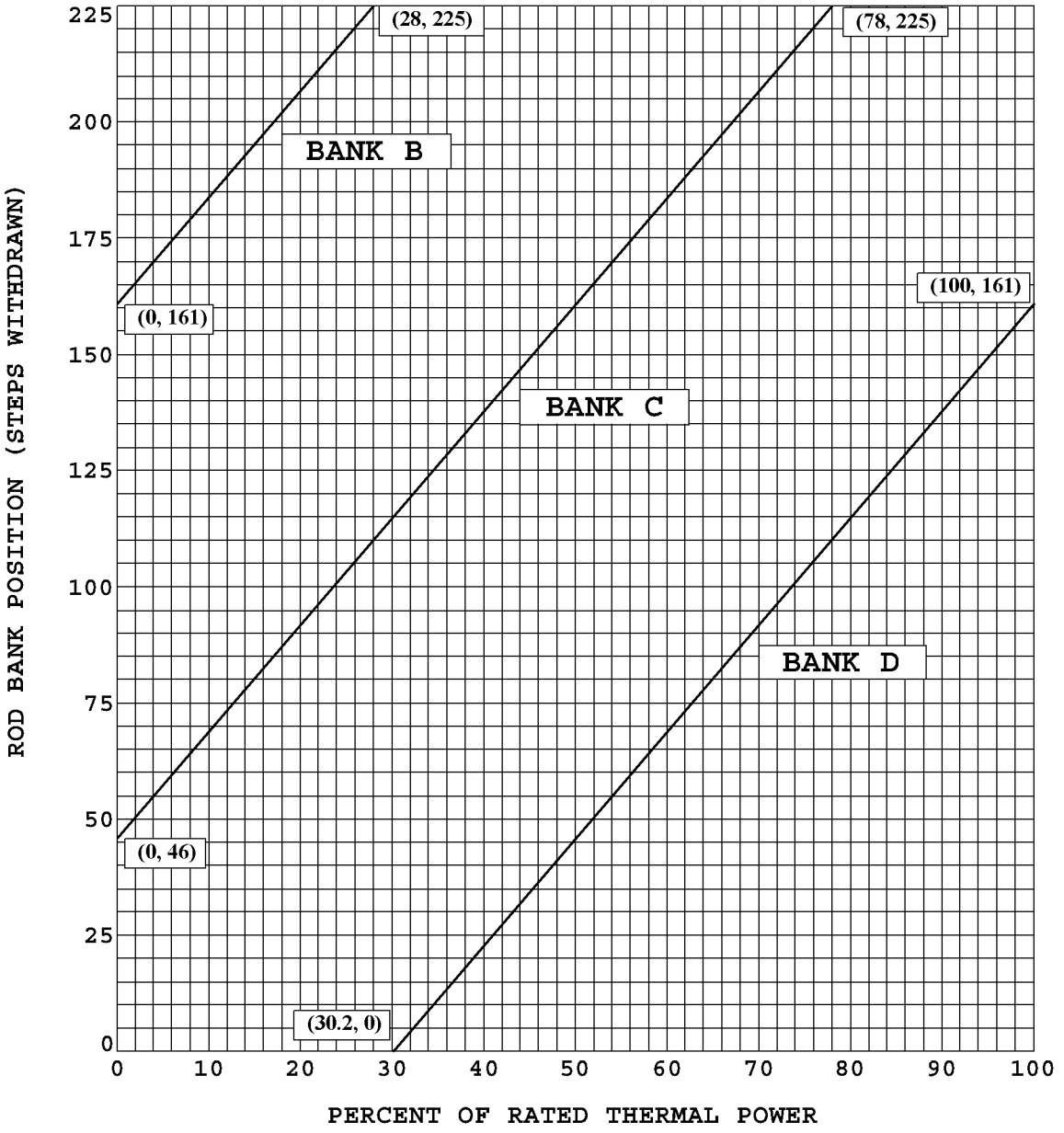

Figure 2

Callaway Cycle 17
Rod Bank Insertion Limits
Versus Rated Thermal Power - Four Loop Operation

2.5 <u>Heat Flux Hot Channel Factor</u> - $F_Q(Z)$
(Specification 3.2.1)

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

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

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

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 17. 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 17 operates with RAOC strategy.

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 17. 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 8% Excluded)

Height (feet)	150 MWD/MTU	4000 MWD/MTU	10000 MWD/MTU	20000 MWD/MTU
0.00 (bottom)	1.0000	1.0000	1.0000	1.0000
0.17	1.0000	1.0000	1.0000	1.0000
0.33	1.0000	1.0000	1.0000	1.0000
0.50	1.0000	1.0000	1.0000	1.0000
0.67	1.0000	1.0000	1.0000	1.0000
0.83	1.0000	1.0000	1.0000	1.0000
1.00	1.4854	1.4726	1.3149	1.3095
1.17	1.4738	1.4591	1.3070	1.3024
1.33	1.4594	1.4423	1.2966	1.2928
1.50	1.4427	1.4232	1.2845	1.2818
1.67	1.4245	1.4024	1.2713	1.2701
1.83	1.4051	1.3804	1.2574	1.2579
2.00	1.3847	1.3583	1.2427	1.2451
2.17	1.3636	1.3363	1.2277	1.2319
2.33	1.3420	1.3141	1.2125	1.2185
2.50	1.3203	1.2918	1.1972	1.2052
2.67	1.2977	1.2690	1.1819	1.1910
2.83	1.2748	1.2463	1.1681	1.1764
3.00	1.2585	1.2276	1.1607	1.1675
3.17	1.2489	1.2151	1.1581	1.1651
3.33	1.2415	1.2080	1.1554	1.1666
3.50	1.2339	1.2002	1.1526	1.1702
3.67	1.2252	1.1928	1.1500	1.1766
3.83	1.2159	1.1897	1.1480	1.1833
4.00	1.2080	1.1868	1.1469	1.1895
4.17	1.2016	1.1826	1.1462	1.1947
4.33	1.1958	1.1780	1.1448	1.1990
4.50	1.1894	1.1729	1.1430	1.2024
4.67	1.1824	1.1671	1.1408	1.2046
4.83	1.1749	1.1608	1.1380	1.2055
5.00	1.1667	1.1539	1.1347	1.2058
5.17	1.1581	1.1465	1.1309	1.2060
5.33	1.1492	1.1387	1.1267	1.2059
5.50	1.1393	1.1298	1.1211	1.2044
5.67	1.1321	1.1211	1.1171	1.2040
5.83	1.1342	1.1156	1.1212	1.2096
6.00	1.1388	1.1157	1.1293	1.2195
6.17	1.1466	1.1210	1.1434	1.2305
6.33	1.1534	1.1287	1.1557	1.2395
6.50	1.1593	1.1377	1.1673	1.2477
6.67	1.1648	1.1470	1.1788	1.2552
6.83	1.1701	1.1552	1.1898	1.2608

Table A.1
W(z) versus Core Height
(Top and Bottom 8% Excluded)

Height (feet)	150 MWD/MTU	4000 MWD/MTU	10000 MWD/MTU	20000 MWD/MTU
7.00	1.1746	1.1623	1.1997	1.2646
7.17	1.1778	1.1683	1.2083	1.2666
7.33	1.1797	1.1730	1.2156	1.2667
7.50	1.1804	1.1766	1.2214	1.2647
7.67	1.1797	1.1786	1.2257	1.2608
7.83	1.1777	1.1786	1.2286	1.2551
8.00	1.1734	1.1800	1.2289	1.2466
8.17	1.1684	1.1843	1.2285	1.2369
8.33	1.1667	1.1865	1.2316	1.2294
8.50	1.1654	1.1882	1.2350	1.2244
8.67	1.1632	1.1905	1.2374	1.2234
8.83	1.1637	1.1930	1.2428	1.2285
9.00	1.1732	1.1967	1.2532	1.2375
9.17	1.1901	1.2028	1.2671	1.2462
9.33	1.2025	1.2114	1.2797	1.2518
9.50	1.2124	1.2224	1.2918	1.2563
9.67	1.2223	1.2348	1.3024	1.2610
9.83	1.2303	1.2467	1.3078	1.2649
10.00	1.2381	1.2542	1.3173	1.2752
10.17	1.2494	1.2601	1.3352	1.2933
10.33	1.2679	1.2768	1.3531	1.3093
10.50	1.2881	1.2977	1.3686	1.3224
10.67	1.3062	1.3154	1.3818	1.3342
10.83	1.3247	1.3308	1.3934	1.3454
11.00	1.3357	1.3409	1.3986	1.3489
11.17	1.0000	1.0000	1.0000	1.0000
11.33	1.0000	1.0000	1.0000	1.0000
11.50	1.0000	1.0000	1.0000	1.0000
11.67	1.0000	1.0000	1.0000	1.0000
11.83	1.0000	1.0000	1.0000	1.0000
12.00 (top)	1.0000	1.0000	1.0000	1.0000

Table A.2

F_Q Penalty Factors as a Function of Cycle Burnup

Cycle 17 Burnup	$F_Q^W(z)$ Penalty Factor (%)
5131	2.27
5303	2.35
5475	2.24
5647	2.12

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.

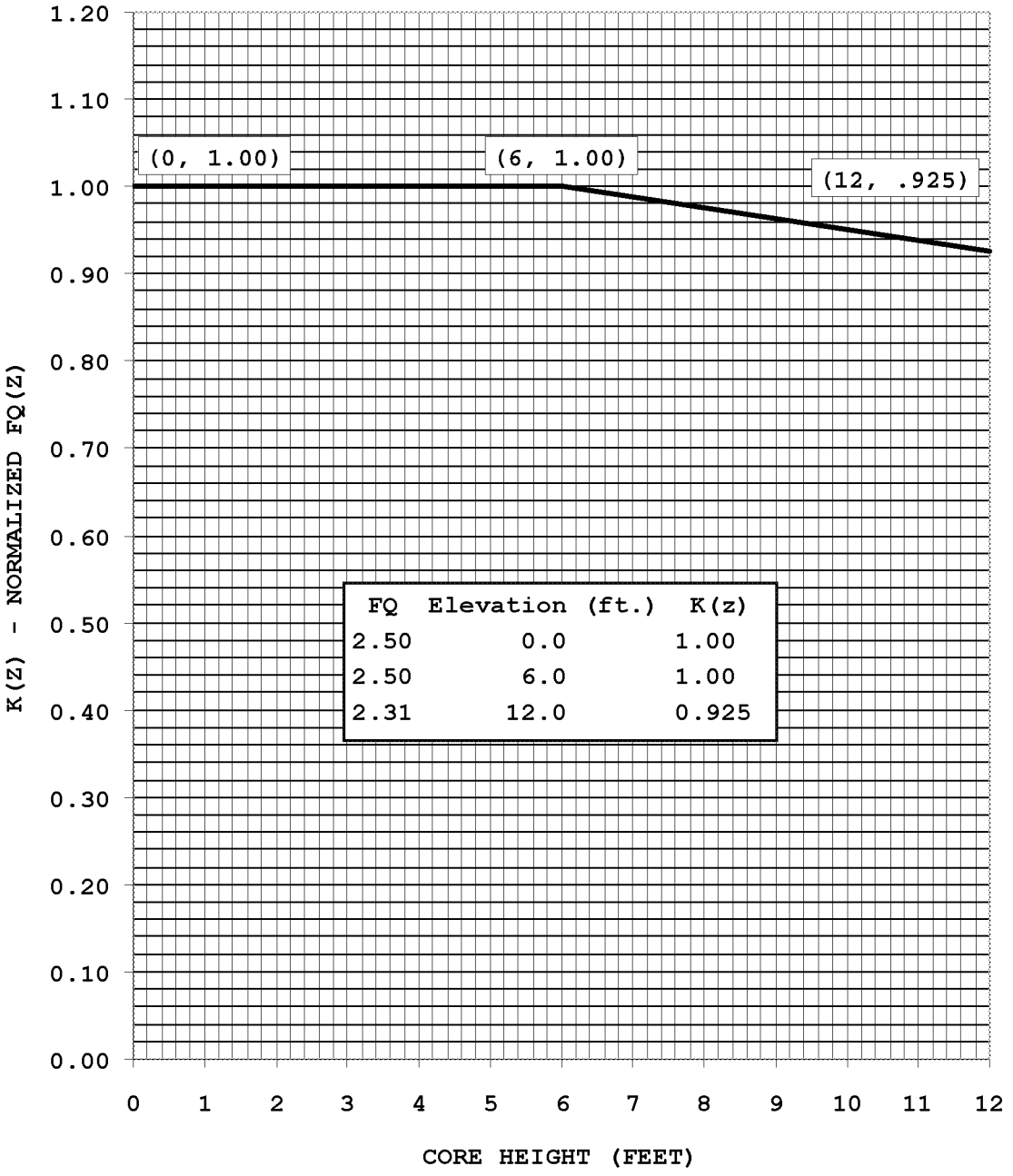

Figure 3

Callaway Cycle 17
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)

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

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.

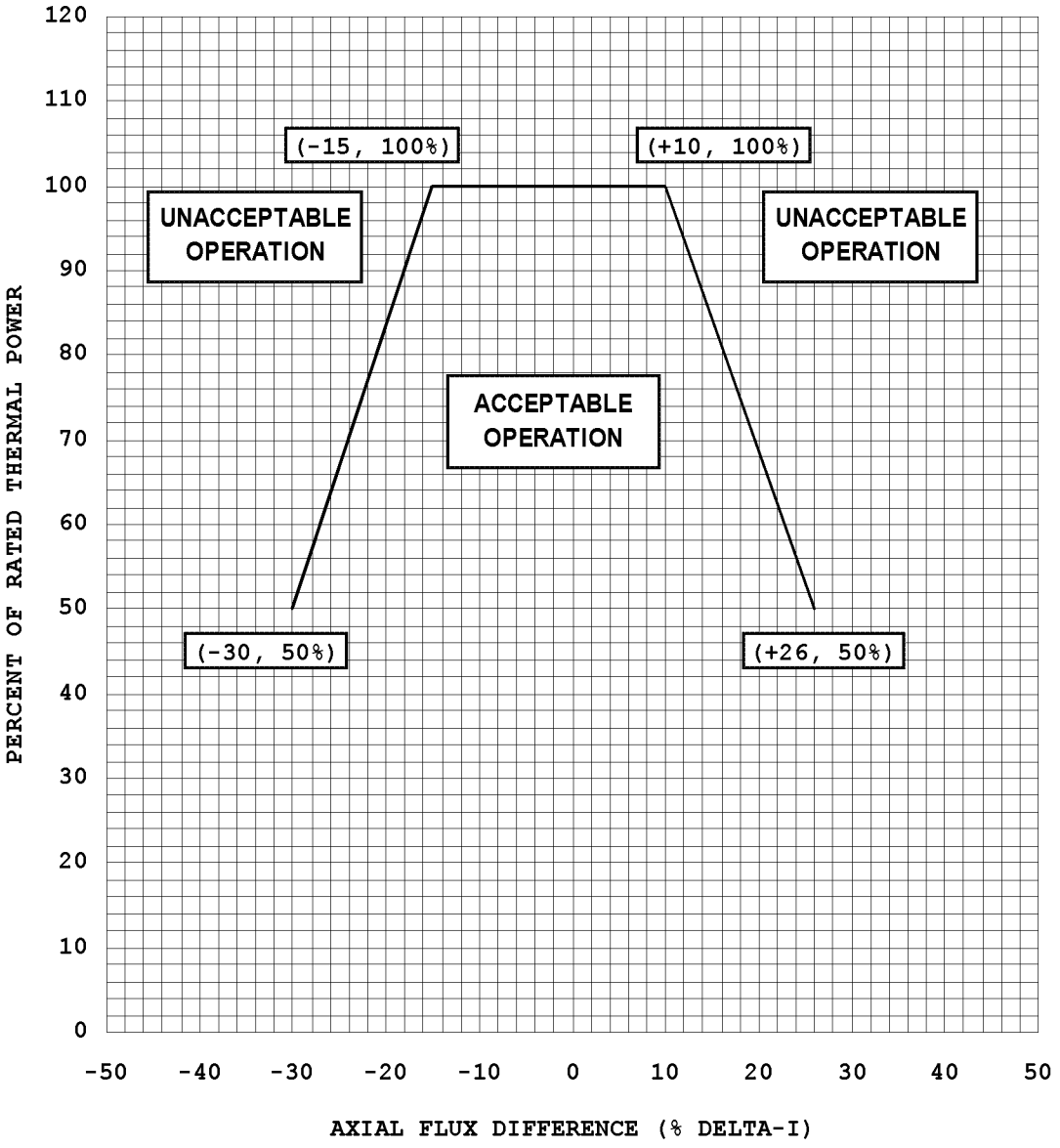

Figure 4

Callaway Cycle 17
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.

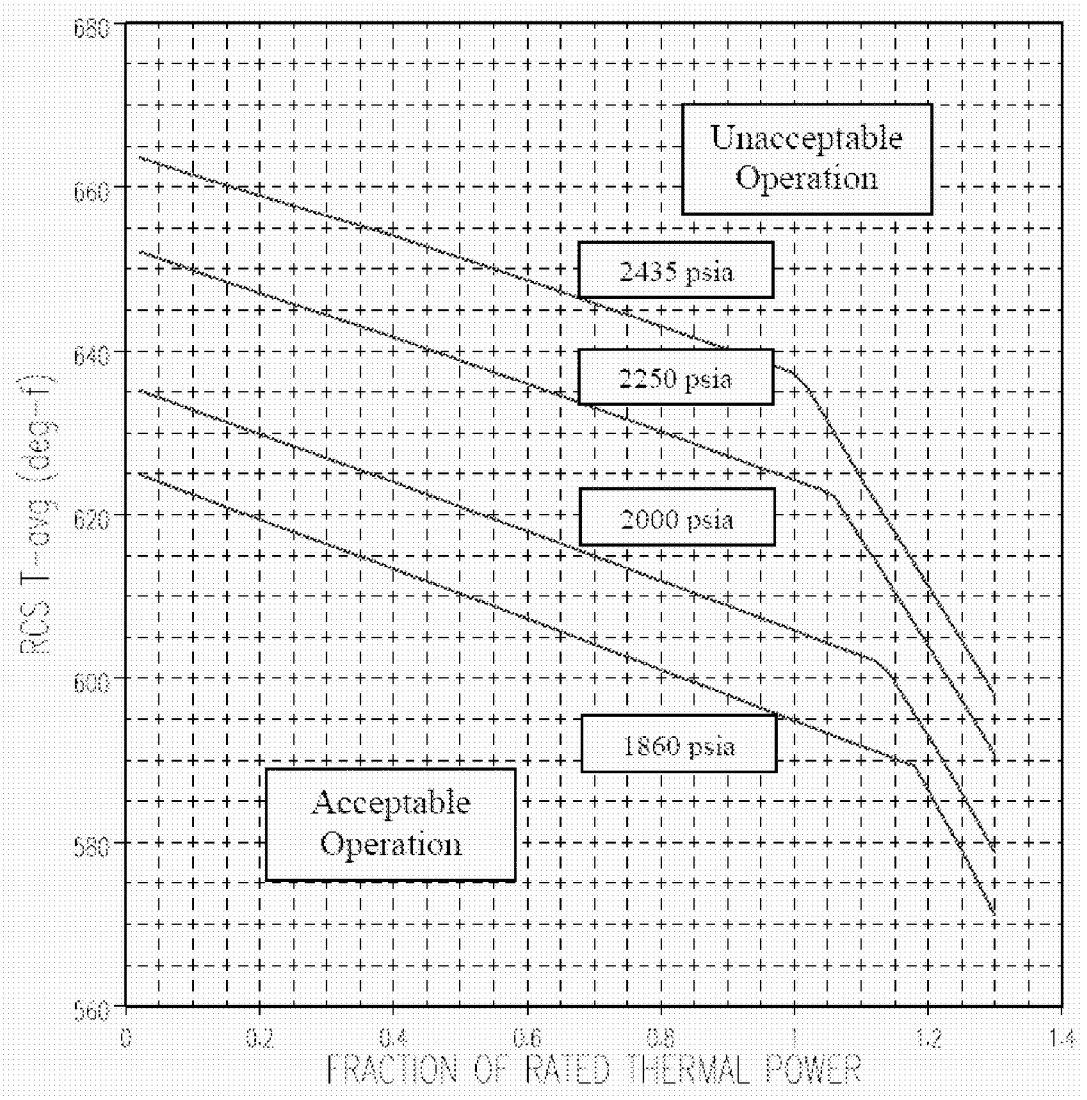

Figure 5

Callaway Cycle 17
Reactor Core Safety Limits

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

Parameter	Value
Overtemperature ΔT reactor trip setpoint	$K_1 = 1.2260$
Overtemperature ΔT reactor trip setpoint T_{avg} coefficient	$K_2 = 0.019/°F$
Overtemperature ΔT reactor trip setpoint pressure coefficient	$K_3 = 0.0011/psig$
Nominal T_{avg} at RTP	$T' \leq 585.3$ °F
Nominal RCS operating pressure	$P' = 2235$ psig
Measured RCS ΔT lead/lag time constants	$\tau_1 \geq 0$ sec $\tau_2 \leq 0$ sec
Measured RCS ΔT lag time constant	$\tau_3 \leq 4$ sec
Measured RCS average temperature lead/lag time constants	$t_4 \geq 27$ sec $t_5 \leq 4$ sec
Measured RCS average temperature lag time constant	$\tau_6 \leq 2$ sec

$f_1(\Delta I) = -0.0280\ \{18\% + (q_t - q_b)\}$ when $(q_t - q_b) < -18\%$ RTP

0 when -18% RTP $\leq (q_t - q_b) \leq 10\%$ RTP

$0.0224\ \{(q_t - q_b) - 10\%\}$ when $(q_t - q_b) > 10\%$ 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)

Parameter	Value
Overpower ΔT reactor trip setpoint	$K_4 = 1.1073$
Overpower ΔT reactor trip setpoint T_{avg} rate/lag coefficient	$K_5 = 0.02/°F$ for increasing T_{avg} $= 0/°F$ for decreasing T_{avg}
Overpower ΔT reactor trip setpoint T_{avg} heatup coefficient	$K_6 = 0.0015/°F$ for $T > T''$ $= 0/°F$ for $T \leq T''$
Nominal T_{avg} at RTP	$T'' \leq 585.3°F$
Measured RCS ΔT lead/lag time constants	$\tau_1 \geq 0$ sec $\tau_2 \leq 0$ sec
Measured RCS ΔT lag time constant	$\tau_3 \leq 4$ sec
Measured RCS average temperature lag time constant	$\tau_6 \leq 2$ sec
Measured RCS average temperature rate/lag time constant	$\tau_7 \geq 10$ 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)

Parameter	Indicated Value
Pressurizer pressure	≥ 2223 psig
RCS average temperature	≤ 590.1 °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.

NRC Safety Evaluation Report dated April 17, 1986, "Acceptance for Referencing of Licensing Topical Report WCAP-8745(P)/8746(NP), 'Design Bases for the Thermal Overpower and Thermal Overtemperature ΔT Trip Functions.'"

10. WCAP-10965-P-A, "ANC: A Westinghouse Advanced Nodal Computer Code," September 1986.

NRC letter dated June 23, 1986, "Acceptance for Referencing of Topical Report WCAP 10965-P and WCAP 10966-NP."

11. WCAP-11596-P-A, "Qualification of the Phoenix-P/ANC Nuclear Design System for

Pressurized Water Reactor Cores," June 1988.

NRC Safety Evaluation Report dated May 17, 1988, "Acceptance for Referencing of the Westinghouse Topical Report WCAP-11596 - Qualification of the Phoenix-P/ANC Nuclear Design System for Pressurized Water Reactor Cores."

12. WCAP-13524-P-A, Revision 1-A, "APOLLO: A One Dimensional Neutron Diffusion Theory Program," September 1997.

    NRC letter dated June 9, 1997, "Acceptance for Referencing of Licensing Topical Reports WCAP-13524 and WCAP-13524, Revision 1, 'APOLLO – A One-Dimensional Neutron Diffusion Theory Program.'"

13. WCAP-12472-P-A, "BEACON Core Monitoring and Operations Support System," August 1994.

    NRC letter dated February 16, 1994, "ACCEPTANCE FOR REFERENCING OF LICENSING TOPICAL REPORT WCAP-12472-P, 'BEACON: CORE MONITORING AND OPERATIONS SUPPORT SYSTEM' (TAC NO. M80078)"