

ENCLOSURE 1

MFN 09-234 Supplement 1

Safety Evaluation Appendix D Markup

Non- Proprietary Information

This is a non-proprietary version of Appendix D of the Draft Safety Evaluation (SE) of NEDE-32906P, Supplement 3, which has the proprietary information removed. Portions that have been removed are indicated by open and closed double brackets as shown here [[]].

Appendix D: Limitations and Conditions from NRC Staff SE of LTR NEDC-33006P

The following limitations and conditions are excerpted from the safety evaluation (SE) of licensing topical report (LTR) NEDC-33006P, "General Electric Boiling Water Reactor [BWR] Maximum Extended Load Line Limit Analysis [MELLLA] Plus," (MELLLA+). All references, section numbers, appendix, and page numbers cited in the following sections refer to those in the SE of LTR NEDC-33006P. All acronyms stated below are defined in the SE of LTR NEDC-33006P. The SE of LTR NEDC-33006P is in the Agencywide Documents Access and Management System at Package Accession No. ML082830769.

12.1 GEXL-PLUS (SECTION 1.1.4)

The plant-specific application will confirm that for operation within the boundary defined by the MELLLA+ upper boundary and maximum CF range, the GEXL-PLUS experimental database covers the thermal-hydraulic conditions the fuel bundles will experience, including, bundle power, mass flux, void fraction, pressure, and subcooling. If the GEXL-PLUS experimental database does not cover the within bundle thermal-hydraulic conditions, during steady state, transient conditions, and DBA conditions, [GEH] will inform the NRC at the time of submittal and obtain the necessary data for the submittal of the plant-specific MELLLA+ application.

In addition, the plant-specific application will confirm that the experimental pressure drop database for the pressure drop correlation covers the pressure drops anticipated in the MELLLA+ range.

With subsequent fuel designs, the plant-specific applications will confirm that the database supporting the CPR correlations covers the powers, flows and void fractions BWR bundles will experience for operation at and within the MELLLA+ domain, during steady state, transient, and DBA conditions. The plant-specific submittal will also confirm that the NRC staff reviewed and approved the associated CPR correlation if the changes in the correlation are outside the GESTAR II (Amendment 22) process. Similarly, the plant-specific application will confirm that the experimental pressure drop database does cover the range of pressures the fuel bundles will experience for operation within the MELLLA+ domain.

12.2 RELATED LTRS (SECTION 1.1.5)

Plant-specific MELLLA+ applications must comply with the limitations and conditions specified in and be consistent with the purpose and content covered in the NRC staff SEs approving the latest version of the following LTRs: NEDC-33173P, NEDC-33075P, and NEDC-33147 (References 37, 45, and 47).

12.3 CONCURRENT CHANGES (SECTION 1.2.1)

- a) The plant-specific analyses supporting MELLLA+ operation will include all operating condition changes that are implemented at the plant at the time of MELLLA+ implementation. Operating condition changes include, but are not limited to, those changes that affect, an increase in the dome pressure, maximum CF, fuel cycle length, or any changes in the licensed operational

- enhancements. For example, with an increase in dome pressure, the following analyses must be analyzed: the ATWS analysis, the ASME overpressure analyses, the transient analyses, and the ECCS-LOCA analysis. Any changes to the safety system settings or any actuation setpoint changes necessary to operate with the increased dome pressure must be included in the evaluations (e.g., SRV setpoints).
- b) For all topics in LTR NEDC-33006P that are reduced in scope or generically dispositioned, the plant-specific application will provide justification that the reduced scope or generic disposition is applicable to the plant. If changes that invalidate the LTR dispositions are to be implemented at the time of MELLLA+ implementation, the plant-specific application will provide analyses and evaluations that demonstrate the cumulative effect with MELLLA+ operation. For example, if the dome pressure is increased, the ECCS performance will be evaluated on a plant-specific basis.
- c) Any generic bounding sensitivity analyses provided in LTR NEDC-33006P will be evaluated to ensure that the key plant-specific input parameters and assumptions are applicable and bounded. If these generic sensitivity analyses are not applicable or additional operating condition changes affect the generic sensitivity analyses, a plant specific evaluation will be provided. For example, with an increase in the dome pressure, the ATWS sensitivity analyses that model operator actions (e.g., depressurization if the HCTL is reached) needs to be reanalyzed, using the bounding dome pressure condition.
- d) If a new GE fuel product line or another vendor's fuel is loaded at the plant, the applicability of any generic sensitivity analyses supporting the MELLLA+ application shall be justified in the plant-specific application. If the generic sensitivity analyses cannot be demonstrated to be applicable, the analyses will be performed including the new fuel. For example, the ATWVS instability analyses supporting the MELLLA+ condition are based on the GE14 fuel response. New analyses that demonstrate the ATWS instability performance of the new GE fuel or another vendor's fuel for MELLLA+ operation shall be provided to support the plant-specific application.
- e) If a new GE fuel product line or another vendor's fuel is loaded at the plant prior to a MELLLA+ application, the analyses supporting the plant-specific MELLLA+ application will be based on a specific core configuration or bounding core conditions. Any topics that are generically dispositioned or reduced in scope in LTR NEDC-33006P will be demonstrated to be applicable, or new analyses based on the specific core configuration' or bounding core conditions will be provided.
- f) If a new GE fuel product line or another vendor's fuel is loaded at the plant prior to a MELLLA+ application, the plant-specific application will reference an NRC-approved stability method supporting MELLLA+ operation, or provide sufficient plant-specific information to allow the NRC staff to review and approve the stability method supporting MELLLA+ operation. The plant-specific application will demonstrate that the analyses and evaluations supporting the stability method are applicable to the fuel loaded in the core.

- g) For MELLLA+ operation, core instability is possible in the event a transient or plant maneuver places the reactor at a high power/low-flow condition. Therefore, plants operating at MELLLA+ conditions must have a NRC-approved instability protection method. In the event the instability protection method is inoperable, the applicant must employ an NRC-approved backup instability method. The licensee will provide technical specification (TS) changes that specify the instability method operability requirements for MELLLA+ operation, including any backup stability protection methods.

12.4 RELOAD ANALYSIS SUBMITTAL (SECTION 1.2.2.3.2)

The plant-specific MELLLA+ application shall provide the plant-specific thermal limits assessment and transient analysis results. Considering the timing requirements to support the reload, the fuel- and cycle-dependent analyses including the plant-specific thermal limits assessment may be submitted by supplementing the initial M+SAR. Additionally, the SRLR for the initial MELLLA+ implementation cycle shall be submitted for NRC staff confirmation.

12.5 OPERATING FLEXIBILITY (SECTION 1.3.3)

- a) The licensee will amend the TS LCO for any equipment out-of-service (i.e., SLO) or operating flexibilities prohibited in the plant-specific MELLLA+ application.
- b) For an operating flexibility, such as FWHOOS, that is prohibited in the MELLLA+ plant-specific application but is not included in the TS LCO, the licensee will propose and implement a license condition.
- c) The power flow map is not specified in the TS; however, it is an important licensed operating domain. Licensees may elect to be licensed and operate the plant under plant-specific-expanded domain that is bounded by the MELLLA+ upper boundary. Plant-specific applications approved for operation within the MELLLA+ domain will include the plant-specific power/flow map specifying the licensed domain in the COLR.

12.6 SLMCPR STATEPOINTS AND CF UNCERTAINTY (SECTION 2.2.1.1)

Until such time when the SLMCPR methodology (References 40 and 41) for off-rated SLMCPR calculation is approved by the staff for MELLLA+ operation, the SLMCPR will be calculated at the rated statepoint (120 percent P/100 percent CF), the plant-specific minimum CF statepoint (e.g., 120 percent P/80 percent CF), and at the 100 percent OLTP at 55 percent CF statepoint. The currently approved off-rated CF uncertainty will be used for the minimum CF and 55 percent CF statepoints. The uncertainty must be consistent with the CF uncertainty currently applied to the SLO operation or as NRC-approved for MELLLA+ operation. The calculated values will be documented in the SRLR.

12.7 STABILITY (SECTION 2.4.1)

Manual operator actions are not adequate to control the consequences of instabilities when operating in the MELLLA+ domain. If the primary stability protection system is declared inoperable, a non-manual NRC-approved backup protection system must be

provided, or the reactor core must be operated below a NRC-approved backup stability boundary specifically approved for MELLLA+ operation for the stability option employed.

12.8 FLUENCE METHODOLOGY AND FRACTURE TOUGHNESS (SECTION 3.2.1)

The applicant is to provide a plant-specific evaluation of the MELLLA+ RPV fluence using the most up-to-date NRC-approved fluence methodology. This fluence will then be used to provide a plant-specific evaluation of the RPV fracture toughness in accordance with RG 1.99, Revision 2.

12.9 REACTOR COOLANT PRESSURE BOUNDARY (SECTION 3.5.1)

MELLLA+ applicants must identify all other than Category "A" materials, as defined in NUREG-0313, Revision 2, that exist in its RCPB piping, and discuss the adequacy of the augmented inspection programs in light of the MELLLA+ operation on a plant-specific basis.

12.10 ECCS-LOCA OFF-RATED MULTIPLIER (SECTION 4.3.1.3)

a) The plant-specific application will provide the 10 CFR Part 50, Appendix K, and the nominal PCTs calculated at the rated EPU power/rated CF, rated EPU power/minimum CF, at the low-flow MELLLA+ boundary (Transition Statepoint). For the limiting statepoint, both the upper bound and the licensing PCT will be reported. The M+SAR will justify why the transition statepoint ECCS-LOCA response bounds the 55 percent CF statepoint. The M+SAR will provide discussion on what power/flow combination scoping calculations were performed to identify the limiting statepoints in terms of DBA-LOCA PCT response for the operation within the MELLLA+ boundary. The M+ SAR will justify that the upper bound and licensing basis PCT provided is in fact the limiting PCT considering uncertainty applications to the non-limiting statepoints.

b) LOCA analysis is not performed on cycle-specific basis; therefore, the thermal limits applied in the M+SAR LOCA analysis for the 55 percent CF MELLLA+ statepoint and/or the transition statepoint must be either bounding or consistent with cycle-specific off-rated limits. The COLR and the SRLR will contain confirmation that the off-rated limits assumed in the ECCS-LOCA analyses bound the cycle-specific off-rated limits calculated for the MELLLA+ operation. Every future cycle reload shall confirm that the cycle-specific off-rated thermal limits applied at the 55 percent CF and/or the transition statepoints are consistent with those assumed in the plant-specific ECCS-LOCA analyses.

c) Off-rated limits will not be applied to the minimum CF statepoint.

d) If credit is taken for these off-rated limits, the plant will be required to apply these limits during core monitoring.

12.11 ECCS-LOCA AXIAL POWER DISTRIBUTION EVALUATION (SECTION 4.3.1.4)

For MELLLA+ applications, the small and large break ECCS-LOCA analyses will include top-peaked and mid-peaked power shape in establishing the MAPLHGR and determining the PCT. This limitation is applicable to both the licensing bases PCT and

the upper bound PCT. The plant-specific applications will report the limiting small and large break licensing basis and upper bound PCTs.

12.12 ECCS-LOCA REPORTING (SECTION 4.3.1.5)

- a) Both the nominal and Appendix K PCTs should be reported for all of the calculated statepoints, and
- b) The plant-variable and uncertainties currently applied will be used, unless the NRC staff specifically approves a different plant variable uncertainty method for application to the non-rated statepoints.

12.13 SMALL BREAK LOCA (SECTION 4.3.2.4)

Small break LOCA analysis will be performed at the MELLLA+ minimum CF and the transition statepoints for those plants that: (1) are small break LOCA limited based on small break LOCA analysis performed at the rated EPU conditions; or (2) have margins of less than or equal to [[]] relative to the Appendix K or the licensing basis PCT.

12.14 BREAK SPECTRUM (SECTION 4.3.3)

The scope of small break LOCA analysis for MELLLA+ operation relies upon the EPU small break LOCA analysis results. Therefore, the NRC staff concludes that for plants that will implement MELLLA+, sufficient small break sizes should be analyzed at the rated EPU power level to ensure that the peak PCT break size is identified.

12.15 BYPASS VOIDING ABOVE THE D-LEVEL (SECTION 5.1.1.5.3)

Plant-specific MELLLA+ applications shall identify where in the MELLLA+ upper boundary the bypass voiding greater than 5 percent will occur above the D-level. The licensee shall provide in the plant-specific submittal the operator actions and procedures that will mitigate the impact of the bypass voiding on the TIPs and the core simulator used to monitor the fuel performance. The plant-specific submittal shall also provide discussion on what impact the bypass voiding greater than 5 percent will have on the NMS as defined in Section 5.1.1.5. The NRC staff will evaluate on plant-specific bases acceptability of bypass voiding above D level.

12.16 RWE (SECTION 9.1.1.2)

Plants operating at the MELLLA+ operating domain shall perform RWE analyses to confirm the adequacy of the generic RBM setpoints. The M+SAR shall provide a discussion of the analyses performed and the results.

12.17 ATWS LOOP (SECTION 9.3.1.1)

As specified in LTR NEDC-33006P, at least two plant-specific ATWS calculations must be performed: MSIVC and PRFO. In addition, if RHR capability is affected by LOOP, then a third plant-specific ATWS calculation must be performed that includes the reduced RHR capability. To evaluate the effect of reduced RHR capacity during LOOP, the plant-specific ATWS calculation must be performed for a sufficiently large period of time after HSBW injection is complete to guarantee that the suppression pool

temperature is cooling, indicating that the RHR capacity is greater than the decay heat generation. The plant-specific application should include evaluation of the safety system performance during the long-term cooling phase, in terms of available NPSH.

12.18 ATWS TRACG ANALYSIS (SECTION 9.3.1.3)

- a) For plants that do not achieve hot shutdown prior to reaching the heat capacity temperature limit (HCTL) based on the licensing ODYN code calculation, plant-specific MELLLA+ implementations must perform best-estimate TRACG calculations on a plant-specific basis.
- b) The TRACG analysis will account for all plant parameters, including water-level control strategy and all plant-specific emergency operating procedure (EOP) actions.
- c) The TRACG calculation is not required if the plant increases the boron-10 concentration/enrichment so that the integrated heat load to containment calculated by the licensing ODYN calculation does not change with respect to a reference OLTP/75 percent flow ODYN calculation.
- d) Peak cladding temperature (PCT) for both phases of the transient (initial overpressure and emergency depressurization) must be evaluated on a plant-specific basis with the TRACG ATWS calculation.
- e) In general, the plant-specific application will ensure that operation in the MELLLA+ domain is consistent with the assumptions used in the ATWS analysis, including equipment out of service (e.g., FWHOOOS, SLO, SRVs, SLC pumps, and RHR pumps, etc.). If assumptions are not satisfied, operation in MELLLA+ is not allowed. The SRLR will specify the prohibited flexibility options for plant-specific MELLLA+ operation, where applicable. For key input parameters, systems and engineering safety features that are important to simulating the ATWS analysis and are specified in the Technical Specification (TS) (e.g., SLCS parameters, ATWS RPT, etc.), the calculation assumptions must be consistent with the allowed TS values and the allowed plant configuration. If the analyses deviate from the allowed TS configuration for long term equipment out of service (i.e., beyond the TS LCO), the plant-specific application will specify and justify the deviation. In addition, the licensee must ensure that all operability requirements are met (e.g., NPSH) by equipment assumed operable in the calculations.
- f) Nominal input parameters can be used in the ATWS analyses provided the uncertainty treatment and selection of the values of these input parameters are consistent with the input methods used in the original GE ATWS analyses in NEDE-24222. Treatment of key input parameters in terms of uncertainties applied or plant-specific TS value used can differ from the original NEDE-24222 approach, provided the manner in which it is used yields more conservative ATWS results.
- g) The plant-specific application will include tabulation and discussion of the key input parameters and the associated uncertainty treatment.

12.19 PLANT-SPECIFIC ATWS INSTABILITY (SECTION 9.3.3.1)

Until such time that NRC approves a generic solution for ATWS instability calculations for MELLLA+ operation, each plant-specific MELLLA+ application must provide ATWS instability analysis that satisfies the ATWS acceptance criteria listed in SRP Section 15.8. The plant-specific ATWS instability calculation must: (1) be based on the peak-reactivity exposure conditions, (2) model the plant-specific configuration important to ATWS instability response including mixed core, if applicable, and (3) use the regional-mode nodalization scheme. In order to improve the fidelity of the analyses, the plant-specific calculations should be based on latest NRC-approved neutronic and thermal-hydraulic codes such as TGBLA06/PANAC11 and TRACG04.

12.20 GENERIC ATWS INSTABILITY (SECTION 9.3.3.1)

Once the generic solution is approved, the plant-specific applications must provide confirmation that the generic instability analyses are relevant and applicable to their plant. Applicability confirmation includes review of any differences in plant design or operation that will result in significantly lower stability margins during ATWS such as:

- turbine bypass capacity,
- fraction of steam-driven feedwater pumps,
- any changes in plant design or operation that will significantly increase core inlet subcooling during ATWS events,
- significant differences in radial and axial power distributions,
- hot-channel power-to-flow ratio,
- fuel design changes beyond GE14.

12.21 INDIVIDUAL PLANT EVALUATION (SECTION 10.5)

Licensees that submit a MELLLA+ application should address the plant-specific risk impacts associated with MELLLA+ implementation, consistent with approved guidance documents (e.g., NEDC-32424P-A, NEDC-32523P-A, and NEDC-33004P-A) and the Matrix 13 of RS-001 and re-address the plant-specific risk impacts consistent with the approved guidance documents that were used in their approved EPU application and Matrix 13 of RS-001. If an EPU and MELLLA+ application come to the NRC in parallel, the expectation is that the EPU submittal will have incorporated the MELLLA+ impacts.

12.22 IASCC (SECTION 10.7)

The applicant is to provide a plant-specific IASCC evaluation when implementing MELLLA+, which includes the components that will exceed the IASCC threshold of 5×10^{20} n/cm² (E>1 MeV), the impact of failure of these components on the integrity of the reactor internals and core support structures under licensing design bases conditions, and the inspections that will be performed on components that exceed the IASCC threshold to ensure timely identification of IASCC, should it occur.

12.23 LIMITATIONS FROM THE ATWS RAI EVALUATIONS (APPENDIX A)

12.23.1 Limitation from Appendix A RAI 4-1

See limitation 12.18.d.

12.23.2 Limitation from Appendix A RAI 4-2

The plant-specific ODYN and TRACG key calculation parameters must be provided to the staff so they can verify that all plant-specific automatic settings are modeled properly.

12.23.3 Limitation from Appendix A RAI 11-4

The ATWS peak pressure response would be dependent upon SRVs upper tolerances assumed in the calculations. For each individual SRV, the tolerances used in the analysis must be consistent with or bound the plant-specific SRV performance. The SRV tolerance test data would be statistically treated using the NRC's historical 95/95 approach or any new NRC-approved statistical treatment method. In the event that current EPU experience base shows propensity for valve drift higher than pre-EPU experience base, the plant-specific transient and ATVVS analyses would be based on the higher tolerances or justify the reason why the propensity for the higher drift is not applicable the plant's SRVs.

12.23.4 Limitation from Appendix A RAI 13-1

EPG/SAG parameters must be reviewed for applicability to MELLLA+ operation in a plant-specific basis. The plant-specific MELLLA+ application will include a section that discusses the plant-specific EOPs and confirms that the ATWS calculation is consistent with the operator actions.

12.23.5 Limitation from Appendix A RAI 14-5

The conclusions of this LTR and associated SE are limited to reactors operating with a power density lower than 52.5 MW/MLBM/hr for operation at the minimum allowable CF at 120 percent OLTP. Verification that reactor operation will be maintained below this analysis limit must be performed for all plant-specific applications.

12.23.6 Limitation from Appendix A RAI 14-9

For MELLLA+ applications involving GE fuel types beyond GE14 or other vendor fuels, bounding ATWS Instability analysis will be provided to the staff. Note: this limitation does not apply to special test assemblies.

12.23.7 Limitation from Appendix A RAI 14-10

See limitation 12.23.6.

12.23.8 Limitation from Appendix A RAI 14-11

The plant-specific ATWS calculations must account for all plant- and fuel-design-specific features, such as the debris filters.

12.23.9 Limitation from Appendix A RAI 16-1

Plant-specific applications must review the safety system specifications to ensure that all of the assumptions used for the ATWS SE indeed apply to their plant-specific conditions.

1 The NRC staff review will give special attention to crucial safety systems like HPCI, and
2 physical limitations like NPSH and maximum vessel pressure that RCIC and HPCI can
3 inject. The plant-specific application will include a discussion on the licensing bases of
4 the plant in terms of NPSH and system performance. It will also include NPSH and
5 system performance evaluation for the duration of the event.
6

7 12.23.10 Limitation from Appendix A RAI 16-3
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9 Plant-specific applications must ensure that an increase in containment pressure
10 resulting from ATWS events with EPU/MELLLA+ operation does not affect adversely the
11 operation of safety-grade equipment.
12

13 12.23.11 Limitation from Appendix A RAI 17-1
14

15 The plant-specific applications must justify the use of plant-specific suppression pool
16 temperature limits for the ODN and TRACG calculations that are higher than the HCTL
17 limit for emergency depressurization.
18

19 12.24 LIMITATIONS FROM FUEL DEPENDENT ANALYSES RAI EVALUATIONS
20 (APPENDIX B)
21

22 12.24.1 Limitation from Appendix B RAI 3
23

24 For EPU/MELLLA+ plant-specific applications that use TRACG or any code that has the
25 capability to model in-channel water rod flow, the supporting analysis will use the actual
26 flow configuration.
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28 12.24.2 Limitation from Appendix B RAI 7
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30 The EPU/MELLLA+ application would provide the exit void fraction of the high-powered
31 bundles in the comparison between the EPU/MELLLA+ and the pre-MELLLA+
32 conditions.
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34 12.24.3 Limitation from Appendix B RAI 17
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36 See limitation 12.6.
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38 12.24.4 Limitation from Appendix B RAI 30
39

40 See limitation 12.18.d.
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