

ATTACHMENT 2

To

Letter from C.R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

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Proposed Amendment 126

Affected TS Pages

TS 3.1-9

TS B3.1-10 through TS B3.1-12

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f. Minimum Conditions for Criticality

1. The reactor shall not be brought to a critical condition until the pressure-temperature state is to the right of the criticality limit line shown in Figure TS 3.1-1.
2. The reactor shall be maintained subcritical by at least 1% $\Delta k/k$ until normal water level is established in the pressurizer.
3. When the reactor is critical and $\leq 60\%$ RATED POWER, the moderator temperature coefficient shall be ≤ 5.0 pcm/ $^{\circ}$ F, except during LOW POWER PHYSICS TESTING. When the reactor is $> 60\%$ RATED POWER, the moderator temperature coefficient shall be zero or negative.
4. If the limits of 3.1.f.3 cannot be met, power operation may continue provided the following actions are taken:
 - A. Within 24 hours, develop and maintain administrative control rod withdrawal limits sufficient to restore the moderator temperature coefficient to within the limits specified in TS 3.1.f.3. These withdrawal limits shall be in addition to the insertion limits specified in TS 3.10.d.
 - B. If the actions specified in TS 3.1.f.4.A are not satisfied, be in HOT STANDBY within the next 6 hours.

Maximum Reactor Coolant Oxygen, Chloride and Fluoride Concentration
(TS 3.1.e)

By maintaining the oxygen, chloride and fluoride concentrations in the reactor coolant below the limits as specified in TS 3.1.e.1 and TS 3.1.e.4, the integrity of the Reactor Coolant System is assured under all operating conditions.⁽¹⁵⁾

If these limits are exceeded, measures can be taken to correct the condition, e.g., replacement of ion exchange resin or adjustment of the hydrogen concentration in the volume control tank⁽¹⁶⁾. Because of the time-dependent nature of any adverse effects arising from oxygen, chloride, and fluoride concentration in excess of the limits, it is unnecessary to shut down immediately since the condition can be corrected. Thus, the time periods for corrective action to restore concentrations within the limits have been established. If the corrective action has not been effective at the end of the time period, reactor cooldown will be initiated and corrective action will continue.

The effects of contaminants in the reactor coolant are temperature dependent. The reactor may be restarted and operation resumed if the maximum concentration of any of the contaminants did not exceed the permitted transient values; otherwise a safety review by the Plant Operations Review Committee is required before startup.

Minimum Conditions for Criticality (TS 3.1.f)

During the early part of the fuel cycle, the moderator temperature coefficient may be calculated to be positive at $\leq 60\%$ RATED POWER. The moderator coefficient will be most positive at the beginning of life of the fuel cycle, when the boron concentration in the coolant is greatest. Later in the fuel cycle, the boron concentrations in the coolant will be lower and the moderator coefficients either will be less positive or will be negative.⁽¹⁷⁾⁽¹⁸⁾

The requirement that the reactor is not to be made critical except as specified in TS 3.1.f. provides increased assurance that the proper relationship between reactor coolant pressure and temperature will be maintained during system heatup and pressurization whenever the reactor vessel is in the nil-ductility temperature range. Heatup to this temperature will be accomplished by operating the reactor coolant pumps and by the pressurizer heaters.

⁽¹⁵⁾USAR Section 4.2

⁽¹⁶⁾USAR Section 9.2

⁽¹⁷⁾USAR Table 3.2-1

⁽¹⁸⁾USAR Figure 3.2-8

The shutdown margin specified in TS 3.10 precludes the possibility of accidental criticality as a result of an increase in moderator temperature or a decrease in coolant pressure.⁽¹⁹⁾

The requirement that the pressurizer is partly voided when the reactor is < 1% subcritical assures that the Reactor Coolant System will not be solid when criticality is achieved.

The requirement that the reactor is not to be made critical when the moderator coefficient is $> 5.0 \text{ pcm/}^\circ\text{F}$ has been imposed to prevent any unexpected power excursion during normal operation, as a result of either an increase in moderator temperature or a decrease in coolant pressure. The moderator temperature coefficient limits are required to maintain plant operation within the assumptions contained in the USAR analyses. Having an initial moderator temperature coefficient no greater than $5.0 \text{ pcm/}^\circ\text{F}$ provides reasonable assurance that the moderator temperature coefficient will be negative at 60% rated thermal power. The moderator temperature coefficient requirement is waived during low power physics tests to permit measurement of reactor moderator coefficient and other physics design parameters of interest. During physics tests, special operating precautions will be taken. In addition, the strong negative Doppler coefficient⁽²⁰⁾ and the small integrated $\Delta k/k$ would limit the magnitude of a power excursion resulting from a reduction in moderator density.

Suitable physics measurements of moderator coefficients of reactivity will be made as part of the startup testing program to verify analytical predictions.

Analysis has shown that maintaining the moderator temperature coefficient at criticality $\leq 5.0 \text{ pcm/}^\circ\text{F}$ will ensure that a negative coefficient will exist at 60% power. Current safety analysis supports operating up to 60% power with a moderator temperature coefficient $\leq 5.0 \text{ pcm/}^\circ\text{F}$. At power levels greater than 60%, a negative moderator temperature coefficient must exist.

In the event that the limits of TS 3.1.f.3 are not met, administrative rod withdrawal limits shall be developed to prevent further increases in temperature with a moderator temperature coefficient that is outside analyzed conditions. By imposing limits on the temperature and the moderator temperature coefficient, the probability of an uncontrolled power excursion remains low.

Due to the control rod insertion limits of TS 3.10.d and potentially developed control rod withdrawal limits, it is possible to have a band for control rod location at a given power level. The withdrawal limits are not required if TS 3.1.f.3 is satisfied or if the reactor is subcritical.

⁽¹⁹⁾USAR Table 3.2-1

⁽²⁰⁾USAR Figure 3.2-9

If after 24 hours, withdrawal limits sufficient to restore the moderator temperature coefficient to within the limits of TS 3.1.f.3 are not developed, the plant shall be taken to HOT STANDBY until the moderator temperature coefficient is within the limits of TS 3.1.f. The reactor is allowed to return to criticality whenever TS 3.1.f is satisfied.