

ATTACHMENT 2

To

Letter from C.R. Steinhardt (WPSC)

to

Document Control Desk (NRC)

Dated

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Proposed Amendment 126A

Affected TS Pages

TS 3.1-11

TS B3.1-12 through TS B3.1-14

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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. The reactor will have a moderator temperature coefficient no less negative than -8 pcm/ $^{\circ}$ F for 95% of the cycle time at full power.
5. 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.

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⁽²⁰⁾. 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⁽²¹⁾⁽²²⁾.

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.

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.

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.

⁽²⁰⁾USAR Section 9.2

⁽²¹⁾USAR Table 3.2-1

⁽²²⁾USAR Figure 3.2-8

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⁽²³⁾ 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.

The calculated hot full power (HFP) moderator temperature coefficient will be more negative than $-8.0 \text{ pcm}/^\circ\text{F}$ for at least 95% of a cycle's time at HFP to ensure the limitations associated with Anticipated Transient Without Scram (ATWS) event are not exceeded. NRC approved methods⁽²⁴⁾⁽²⁵⁾ will be used to determine the lowest expected HFP moderator temperature coefficient for the 5% of HFP cycle time with the highest boron concentration. The cycle time at HFP is the maximum number of days that the cycle could be at HFP based on the design calculation of cycle length. The cycle time at HFP can also be expressed in terms of burnup by converting the maximum number of days at full power to an equivalent burnup. If this HFP moderator temperature coefficient is more negative than $-8.0 \text{ pcm}/^\circ\text{F}$, then the ATWS design limit will be met for 95% of the cycle's time at HFP. If this HFP moderator temperature coefficient design limit is still not met after excluding the 5% of the cycle burnup with the highest boron concentration, then the core loading must be revised.

⁽²³⁾USAR Figure 3.2-9

⁽²⁴⁾NRC Safety Evaluation Report for Qualification of Reactor Physics, Methods for Application to Kewaunee, dated October 22, 1979.

⁽²⁵⁾NRC Safety Evaluation Report for the Reload Safety Evaluation Methods for Application to Kewaunee, dated April 11, 1988.

The results of this design limit consideration will be reported in the Reload Safety Evaluation Report.

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. In this case, the calculated HFP moderator temperature coefficient will be made less negative by the same amount the hot zero power moderator temperature coefficient exceeded the limit in TS 3.1.f.3. This will be accomplished by developing and implementing administrative control rod withdrawal limits to achieve a moderator temperature coefficient within the limits for HFP moderator temperature coefficient.

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.

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 NOT 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.