



Tennessee Valley Authority
1101 Market Street, LP 3R
Chattanooga, Tennessee 37402-2801

R. M. Krich
Vice President
Nuclear Licensing

July 1, 2011

10 CFR 50.4

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Sequoyah Nuclear Plant, Unit 2
Facility Operating License No. DPR-79
NRC Docket No. 50-328

Subject: **Sequoyah Nuclear Plant, Unit 2, Cycle 18, Core Operating Limits Report**

The purpose of this letter is to submit the Sequoyah Nuclear Plant (SQN), Unit 2, Cycle 18, Core Operating Limits Report (COLR), Revision 0, as required by SQN Technical Specification (TS) 6.9.1.14.c. TS 6.9.1.14.c requires the COLR to be provided to the NRC within 30 days after cycle startup (i.e., Mode 2) for each reload cycle. SQN, Unit 2, entered Mode 2 on June 22, 2011, for the current reload cycle. Therefore, the Tennessee Valley Authority is submitting the enclosed COLR prior to July 22, 2011.

There are no new regulatory commitments in this letter. Should you have any questions concerning this submittal, please contact Dan Green at (423) 751-8423.

Respectfully,

R. M. Krich

Enclosure: Sequoyah Nuclear Plant, Unit 2, Cycle 18, Core Operating Limits Report, Revision 0

cc (Enclosure):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Sequoyah Nuclear Plant

AOB
NAR

ENCLOSURE

**SEQUOYAH NUCLEAR PLANT
UNIT 2, CYCLE 18
CORE OPERATING LIMITS REPORT
REVISION 0**

SEQUOYAH UNIT 2 CYCLE 18
CORE OPERATING LIMITS REPORT

REVISION 0

June 2011

Prepared by:

Brandon Catalano, R. L. G. Ltd. 6/14/11
PWR Fuel Engineering Date

Verified by:

Mark D. Porter 6/14/2011
PWR Fuel Engineering Date

Reviewed by:

[Signature] 6/14/11
PWR Fuel Engineering Manager Date

[Signature] WILLIAM STACKER 6/14/11
Reactor Engineering Supervisor Date

Approved by:

[Signature] 6-14-11
PORC Chairman Date

[Signature] 6/14/11
Plant Manager Date

Revision 0

Pages affected All

Reason for Revision: Initial Issue

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

1.0 CORE OPERATING LIMITS REPORT

This Core Operating Limits Report (COLR) for Sequoyah Unit 2 Cycle 18 has been prepared in accordance with the requirements of Technical Specification (TS) 6.9.1.14.

The TSs affected by this report are listed below:

TABLE 2.2-1 $f_1(\Delta I)$ trip reset function for OT Δ T Trip (QTNL, QTPL) and rates of trip setpoint decrease per percent ΔI (QTNS, QTPS)

TABLE 2.2-1 $f_2(\Delta I)$ trip reset function for OP Δ T Trip (QPNL, QPPL) and rates of trip setpoint decrease per percent ΔI (QPNS, QPPS)

- 3/4.1.1.3 Moderator Temperature Coefficient (MTC)
- 3/4.1.3.5 Shutdown Rod Insertion Limit
- 3/4.1.3.6 Control Rod Insertion Limits
- 3/4.2.1 Axial Flux Difference (AFD)
- 3/4.2.2 Heat Flux Hot Channel Factor ($F_Q(X,Y,Z)$)
- 3/4.2.3 Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}(X,Y)$)

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 the NRC approved methodologies specified in TS 6.9.1.14. The versions of the topical reports which describe the methodologies used for this cycle are listed in Table 1.

The following abbreviations are used in this section:

BOL stands for Beginning of Cycle Life
ARO stands for All Rods Out
HZP stands for Hot Zero THERMAL POWER
EOL stands for End of Cycle Life
RTP stands for RATED THERMAL POWER

2.1 Moderator Temperature Coefficient - MTC (Specification 3/4.1.1.3)

2.1.1 The MTC limits are:

The BOL/ARO/HZP MTC shall be less positive than 0 $\Delta k/k/^\circ F$ (BOL limit). With the measured BOL/ARO/HZP MTC more positive than $-0.07 \times 10^{-5} \Delta k/k/^\circ F$ (as-measured MTC limit), establish control rod withdrawal limits to ensure the MTC remains less positive than 0 $\Delta k/k/^\circ F$ for all times in core life.

The EOL/ARO/RTP MTC shall be less negative than or equal to $-4.5 \times 10^{-4} \Delta k/k/^\circ F$.

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

2.1.2 The 300 ppm surveillance limit is:

The measured 300 ppm/ARO/RTP MTC should be less negative than or equal to $-3.75 \times 10^{-4} \Delta k/k/^\circ F$.

2.2 Shutdown Rod Insertion Limit (Specification 3/4.1.3.5)

2.2.1 The shutdown rods shall be withdrawn to a position as defined below:

| <u>Cycle Burnup (MWD/MTU)</u> | <u>Steps Withdrawn</u> |
|-------------------------------|--------------------------|
| ≥ 0 | ≥ 225 to ≤ 231 |

2.3 Control Rod Insertion Limits (Specification 3/4.1.3.6)

2.3.1 The control rod banks shall be limited in physical insertion as shown in Figure 1.

2.4 Axial Flux Difference - AFD (Specification 3/4.2.1)

2.4.1 The axial flux difference (AFD) limits (AFD^{Limit}) are provided in Figure 2.

2.5 Heat Flux Hot Channel Factor - $F_Q(X,Y,Z)$ (Specification 3/4.2.2)

$F_Q(X,Y,Z)$ shall be limited by the following relationships:

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

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

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

2.5.1 $F_Q^{RTP} = 2.62$

2.5.2 $K(Z)$ is provided in Figure 3.

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

The following parameters are required for core monitoring per the Surveillance Requirements of Specification 3/4.2.2:

2.5.3 $NSLOPE^{AFD} = 1.16$

where $NSLOPE^{AFD} =$ Negative AFD limit adjustment required to compensate for each 1% that $F_Q(X,Y,Z)$ exceeds BQDES.

2.5.4 $PSLOPE^{AFD} = 2.76$

where $PSLOPE^{AFD} =$ Positive AFD limit adjustment required to compensate for each 1% that $F_Q(X,Y,Z)$ exceeds BQDES.

2.5.5 $NSLOPE^{f_2(\Delta I)} = 1.44$

where $NSLOPE^{f_2(\Delta I)} =$ Adjustment to negative OP Δ T $f_2(\Delta I)$ limit required to compensate for each 1% that $F_Q(X,Y,Z)$ exceeds BCDES.

2.5.6 $PSLOPE^{f_2(\Delta I)} = 2.33$

where $PSLOPE^{f_2(\Delta I)} =$ Adjustment to positive OP Δ T $f_2(\Delta I)$ limit required to compensate for each 1% that $F_Q(X,Y,Z)$ exceeds BCDES.

2.5.7 $BQNOM(X,Y,Z) =$ Nominal design peaking factor, increased by an allowance for the expected deviation between the nominal design power distribution and the measurement.

2.5.8 $BQDES(X,Y,Z) =$ Maximum allowable design peaking factor which ensures that the $F_Q(X,Y,Z)$ limit will be preserved for operation within the LCO limits, including allowances for calculational and measurement uncertainties.

2.5.9 $BCDES(X,Y,Z) =$ Maximum allowable design peaking factor which ensures that the centerline fuel melt limit will be preserved for operation within the LCO limits, including allowances for calculational and measurement uncertainties.

$BQNOM(X,Y,Z)$, $BQDES(X,Y,Z)$, and $BCDES(X,Y,Z)$ data bases are provided for input to the plant power distribution analysis codes on a cycle specific basis and are determined using the methodology for core limit generation described in the references in Specification 6.9.1.14.

2.5.10 The increase in $F_Q^M(X,Y,Z)$ for compliance with the 4.2.2.2.e Surveillance Requirements is defined as follows:

For cycle burnups 0 to 2796 MWd/mtU, use 2.0%
For cycle burnups >2796 to 4924 MWd/mtU, use 3.47%
For cycle burnups > 4924 to 11699 MWd/mtU, use 2.0%
For cycle burnups >11699 to 11897 MWd/mtU, use 2.09%
For cycle burnups > 11897 MWd/mtU, use 2.0%

2.6 **Nuclear Enthalpy Rise Hot Channel Factor - $F_{\Delta H}(X,Y)$ (Specification 3/4.2.3)**

$F_{\Delta H}(X,Y)$ shall be limited by the following relationship:

$$F_{\Delta H}(X,Y) \leq \text{MAP}(X,Y,Z) / \text{AXIAL}(X,Y)$$

2.6.1 $\text{MAP}(X,Y,Z)$ is provided in Table 2.

$\text{AXIAL}(X,Y)$ is the axial peak from the normalized axial power shape.

The following parameters are required for core monitoring per the Surveillance Requirements of Specification 3/4.2.3:

$$F_{\Delta HR}^M(X,Y) \leq \text{BHNOM}(X,Y)$$

$$\text{where } F_{\Delta HR}^M(X,Y) = F_{\Delta H}^M(X,Y) / [\text{MAP}^M / \text{AXIAL}(X,Y)]$$

$F_{\Delta H}^M(X,Y)$ is the measured radial peak at location X,Y.

MAP^M is the value of $\text{MAP}(X,Y,Z)$ obtained from Table 2 for the measured peak.

2.6.2 $\text{BHNOM}(X,Y) =$ Nominal design radial peaking factor, increased by an allowance for the expected deviation between the nominal design power distribution and the measurement.

2.6.3 $\text{BHDES}(X,Y) =$ Maximum allowable design radial peaking factor which ensures that the $F_{\Delta H}(X,Y)$ limit will be preserved for operation within the LCO limits, including allowances for calculational and measurement uncertainties.

2.6.4 $\text{BRDES}(X,Y) =$ Maximum allowable design radial peaking factor which ensures that the steady state DNBR limit will be preserved for operation within the LCO limits, including allowances for calculational and measurement uncertainties.

$\text{BHNOM}(X,Y)$, $\text{BHDES}(X,Y)$ and $\text{BRDES}(X,Y)$ data bases are provided for input to the plant power distribution analysis computer codes on a cycle specific basis and are determined using the methodology for core limit generation described in the references in Specification 6.9.1.14.

2.6.5 $\text{RRH} = 3.34$ when $0.8 < P \leq 1.0$

$\text{RRH} = 1.67$ when $P \leq 0.8$

where $\text{RRH} =$ Thermal power reduction required to compensate for each 1% that $F_{\Delta H}(X,Y)$ exceeds its limit.

$P =$ Thermal Power / Rated Thermal Power

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

2.6.6 TRH = 0.0334 when $0.8 < P \leq 1.0$

TRH = 0.0167 when $P \leq 0.8$

where TRH = Reduction in OTΔT K_1 setpoint required to compensate for each 1% $F_{\Delta H}(X,Y)$ exceeds its limit.

$P =$ Thermal Power / Rated Thermal Power

2.6.7 All cycle burnups shall use a 2% increase in $F_{\Delta H}^M(X,Y)$ margin for compliance with the 4.2.3.2.d.1 Surveillance Requirement.

3.0 REACTOR CORE PROTECTIVE LIMITS

3.1 Trip Reset Term [$f_1(\Delta I)$] for Overtemperature Delta T-Trip (Specification 2.2.1)

The following parameters are required to specify the power level-dependent $f_1(\Delta I)$ trip reset term limits for the Overtemperature Delta-T trip function:

3.1.1 QTNL = -20%

where QTNL = Maximum negative ΔI setpoint at rated thermal power at which the trip setpoint is not reduced by the axial power distribution.

3.1.2 QTPL = +5%

where QTPL = Maximum positive ΔI setpoint at rated thermal power at which the trip setpoint is not reduced by the axial power distribution.

3.1.3 QTNS = 2.50%

where QTNS = Percent reduction in Overtemperature Delta-T trip setpoint for each percent that the magnitude of ΔI exceeds its negative limit at rated thermal power (QTNL).

3.1.4 QTPS = 1.40%

where QTPS = Percent reduction in Overtemperature Delta-T trip setpoint for each percent that the magnitude of ΔI exceeds its positive limit at rated thermal power (QTPL).

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

3.2 Trip Reset Term [$f_2(\Delta I)$] for Overpower Delta-T Trip (Specification 2.2.1)

The following parameters are required to specify the power level-dependent $f_2(\Delta I)$ trip reset term limits for the Overpower Delta-T trip function:

3.2.1 QPNL = -25%

where QPNL = Maximum negative ΔI setpoint at rated thermal power at which the trip setpoint is not reduced by the axial power distribution.

3.2.2 QPPL = +25%

where QPPL = Maximum positive ΔI setpoint at rated thermal power at which the trip setpoint is not reduced by the axial power distribution.

3.2.3 QPNS = 1.70%

where QPNS = Percent reduction in Overpower Delta-T trip setpoint for each percent that the magnitude of ΔI exceeds its negative limit at rated thermal power (QPNL).

3.2.4 QPPS = 1.70%

where QPPS = Percent reduction in Overpower Delta-T trip setpoint for each percent that the magnitude of ΔI exceeds its positive limit at rated thermal power (QPPL).

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

Table 1

COLR Methodology Topical Reports

1. BAW-10180-A, Revision 1, "NEMO – Nodal Expansion Method Optimized," March 1993.
(Methodology for Specification 3/4.1.1.3 - Moderator Temperature Coefficient)
2. BAW-10169P-A, Revision 0, "RSG Plant Safety Analysis – B&W Safety Analysis Methodology for Recirculating Steam Generator Plants," October 1989.
(Methodology for Specification 3/4.1.1.3 - Moderator Temperature Coefficient)
3. BAW-10163P-A, Revision 0, "Core Operating Limit Methodology for Westinghouse-Designed PWRs," June 1989.
(Methodology for Specifications 2.2.1 – Reactor Trip System Instrumentation Setpoints [$f_1(\Delta I)$, $f_2(\Delta I)$ limits], 3/4.1.3.5 - Shutdown Rod Insertion Limit, 3/4.1.3.6 - Control Rod Insertion Limits, 3/4.2.1 - Axial Flux Difference, 3/4.2.2 - Heat Flux Hot Channel Factor, 3/4.2.3 - Nuclear Enthalpy Rise Hot Channel Factor)
4. BAW-10168P-A, Revision 3, "RSG LOCA – BWNT Loss of Coolant Accident Evaluation Model for Recirculating Steam Generator Plants," December 1996.
(Methodology for Specification 3/4.2.2 - Heat Flux Hot Channel Factor)
5. BAW-10227P-A, Revision 1, "Evaluation of Advanced Cladding and Structural Material (M5) in PWR Reactor Fuel," June 2003.
(Methodology for Specification 3/4.2.2 - Heat Flux Hot Channel Factor)
6. BAW-10186P-A, Revision 2, "Extended Burnup Evaluation," June 2003.
(Methodology for Specification 3/4.2.2 - Heat Flux Hot Channel Factor)
7. EMF-2103P-A, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors", April 2003.
(Methodology for Specification 3/4.2.2-Heat Flux Hot Channel Factor)

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

Table 2

Maximum Allowable Peaking Limits MAP(X,Y,Z)

| AXIAL (X, Y) | ELEVATION (ft) | MAP (X, Y, Z) | AXIAL (X, Y) | ELEVATION (ft) | MAP (X, Y, Z) |
|--------------|----------------|---------------|--------------|----------------|---------------|
| 1.1 | 2 | 1.9796 | 1.9 | 2 | 2.8084 |
| | 4 | 1.9750 | | 4 | 2.9772 |
| | 6 | 1.9675 | | 6 | 2.9986 |
| | 8 | 1.9561 | | 8 | 2.8424 |
| | 10 | 1.9346 | | 10 | 2.6948 |
| 1.2 | 2 | 2.1787 | >1.9 | 2 | 2.5301 |
| | 4 | 2.1683 | | 4 | 2.6821 |
| | 6 | 2.1890 | | 6 | 2.7014 |
| | 8 | 2.1626 | | 8 | 2.5607 |
| | 10 | 2.0894 | | 10 | 2.4278 |
| 1.3 | 2 | 2.4200 | 2.2 | 2 | 2.6742 |
| | 4 | 2.4024 | | 4 | 3.3050 |
| | 6 | 2.4119 | | 6 | 3.1569 |
| | 8 | 2.3100 | | 8 | 3.0147 |
| | 10 | 2.1923 | | 10 | 2.7071 |
| 1.4 | 2 | 2.6650 | 2.6 | 2 | 2.6810 |
| | 4 | 2.6238 | | 4 | 3.5687 |
| | 6 | 2.5696 | | 6 | 3.5402 |
| | 8 | 2.4224 | | 8 | 3.3006 |
| | 10 | 2.2895 | | 10 | 2.9649 |
| 1.5 | 2 | 2.7164 | 3.0 | 2 | 2.9366 |
| | 4 | 2.7476 | | 4 | 3.7887 |
| | 6 | 2.6782 | | 6 | 4.1090 |
| | 8 | 2.5262 | | 8 | 3.6762 |
| | 10 | 2.3832 | | 10 | 3.3366 |
| 1.7 | 2 | 2.7673 | 3.5 | 2 | 2.9665 |
| | 4 | 2.9138 | | 4 | 4.0948 |
| | 6 | 2.8590 | | 6 | 4.1053 |
| | 8 | 2.7018 | | 8 | 3.7168 |
| | 10 | 2.5502 | | 10 | 3.4708 |

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

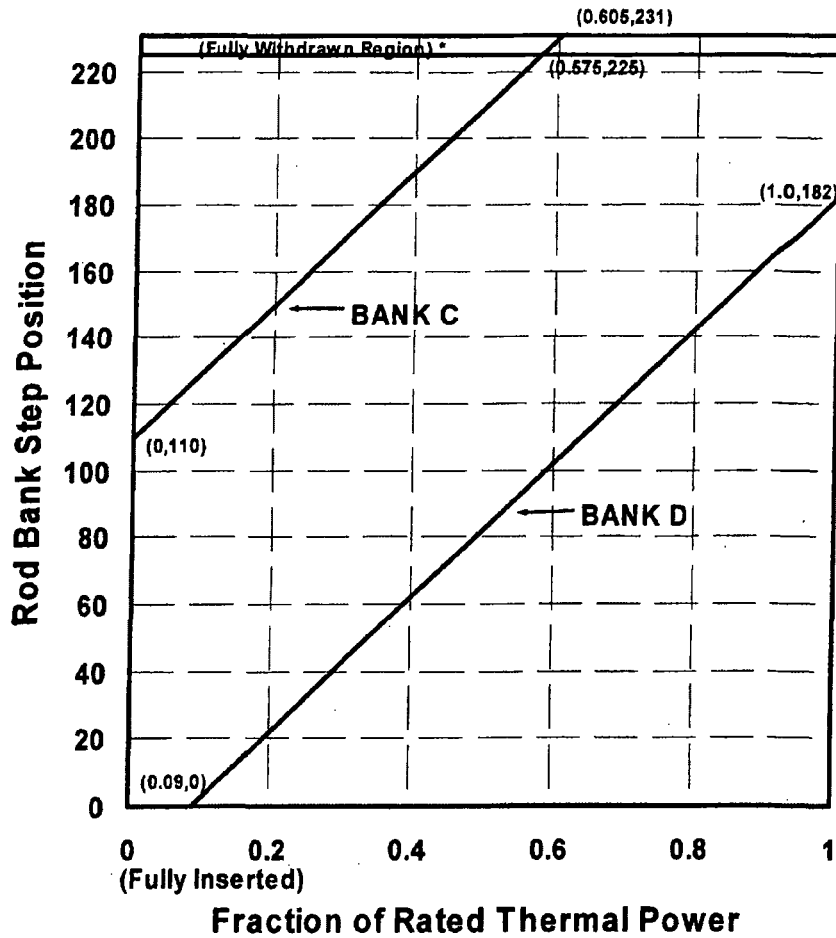


FIGURE 1
Rod Bank Insertion Limits Versus
Thermal Power, Four Loop Operation

*Fully withdrawn region shall be the condition where shutdown and control banks are at a position within the interval of ≥ 225 and ≤ 231 steps withdrawn, inclusive.

Fully withdrawn shall be the position as defined below,

Cycle Burnup (MWd/mtU)
 ≥ 0

Steps Withdrawn
 ≥ 225 to ≤ 231

This figure is valid for operation at a rated thermal power of 3455 MWt when the LEFM is in operation. If the LEFM becomes inoperable, then prior to the next NIS calibration, the maximum allowable power level must be reduced by 1.3% in power, and the rod insertion limit lines must be increased by 3 steps withdrawn until the LEFM is returned to operation.

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

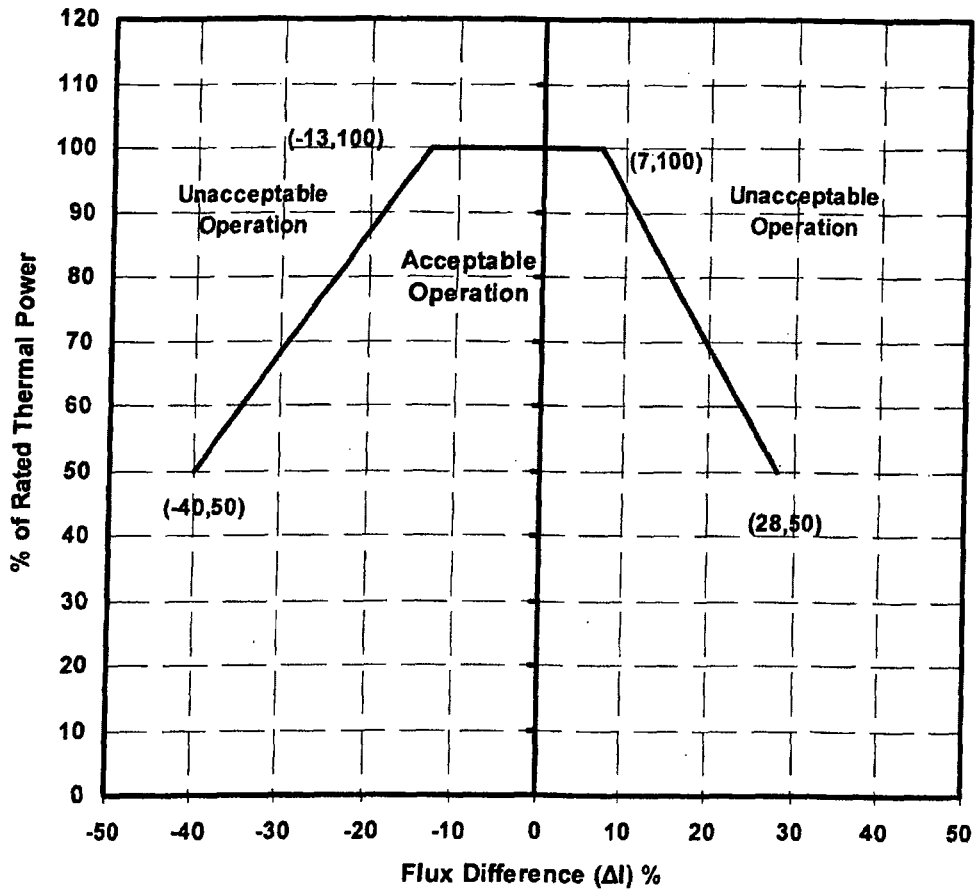


FIGURE 2

**Axial Flux Difference Limits
As A Function of Thermal Power
For Burnup Range 0 EFPD to EOL**

This figure is valid for operation at a rated thermal power of 3455 MWt when the LEFM is in operation.

If the LEFM becomes inoperable, then prior to the next NIS calibration, the maximum allowable power level must be reduced by 1.3% in power, and the AFD limit lines must be made more restrictive by 1% in AFD until the LEFM is returned to operation.

COLR FOR SEQUOYAH UNIT 2 CYCLE 18

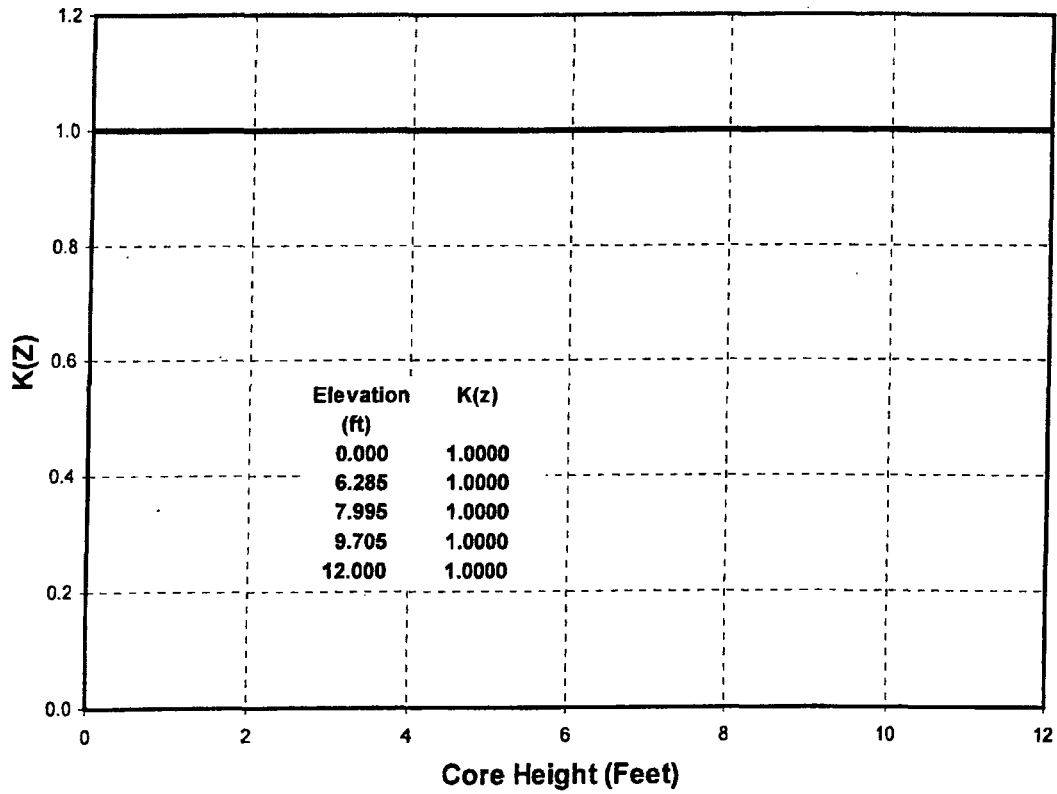


FIGURE 3

K(Z) - Normalized FQ(X,Y,Z) as a Function of Core Height