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June 6, 1997

10 CFR 50.59

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Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Reactor Test Program - Revision 6

For your information and consistent with past practices, enclosed is a copy of Revision 6 to the Kewaunee Nuclear Power Plant Reactor Test Program. This revision changes the definition of the Reference Bank for use in the rod swap technique. The definition of the reference bank was changed to allow for a bank other than the highest worth bank to be used for the reference bank if the highest worth bank will cause reactivity shadowing affects on the measurement of the remaining control rod banks.

The revision was made in accordance with section 5 of the Reactor Test Program and 10 CFR 50.59(a)(1)(iii).

Sincerely,

M. L. Marchi
Manager - Nuclear Business Group

MAR

Enc.

A001/1

cc - US NRC - Region III
NRC Senior Resident Inspector

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REACTOR TEST PROGRAM

KEWAUNEE NUCLEAR POWER PLANT

Wisconsin Public Service Corporation
Wisconsin Power & Light Company
Madison Gas & Electric Company

Revision 6
May 19, 1997

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1.0 INTRODUCTION . . . .

This report describes the Reactor Test Program at the Kewaunee Nuclear Power Plant for the start-up of a reload core. Included are the test objectives, descriptions, and review and acceptance criteria.

The objective of the reactor test program is to verify that the reload core, and hence the reactor, is safe and can be operated in a safe manner. Furthermore, the test program verifies the reliability and accuracy of the computer codes used to analyze the reload core.

Appendix A contains the necessary information for approval of the rod swap method of measuring rod bank worths. This includes a comparison of the cycle IV results obtained independently by WPS and Westinghouse, and cycle V predictions from WPS and Exxon Nuclear Corporation.

This report offers a brief description of the Kewaunee Plant test program and is not intended to provide a detailed specification of the future test programs for use in a compliance inspection.

2.0 LOW POWER TESTS . . . .

The tests described in this section are to be performed at "low power". For the purposes of this report, low power is defined as the power range below the point of adding nuclear heat.

All measurements taken during these tests and all predictions include corrections for uncertainties, such as measurements and prediction accuracy. Extreme care is taken to maintain steady state conditions wherever practical in the tests, to assure that the parameter under surveillance can be measured as accurately as practical.

2.1 ROD DROP TIME

The objective of the rod drop time test is to verify the mobility and minimum reaction time of the rods, thus assuring the capability to safely shut down the reactor, if necessary.

The test is performed at normal operating temperature with both reactor coolant pumps running. This test will be conducted prior to initial criticality.

The desired banks are withdrawn to the full out position. All of the rods in the selected banks are then dropped simultaneously by depressing the reactor trip push button. Rod drop time data is collected by the Data Acquisition System (DAS) for all the rods in the selected banks. This process is repeated until all rods have been tested.

Rod drop times are then determined from the traces produced from the DAS. For conservatism, the initiation of the event is assumed to be the first indication of the reactor trip pushbutton initiation. The end of the event is chosen as the point when the rod enters the dashpot.

The first indication of the event is determined by monitoring the output off a contact in the reactor trip pushbutton circuitry that is energized when the reactor trip pushbutton is depressed. The Rod Position Indication (RPI) produced rod drop signal is also recorded by the DAS for each rod drop during the test. A frequency monitor is also connected to one of the RPI signals to confirm the 60 Hz. frequency of the RPI data. Figure 2.1-1 shows a typical strip chart trace for this test.

The acceptance criterion for this test is Technical Specification 3.10.h. If this specification is not met, the rod shall be declared inoperable.

2.2 INITIAL CRITICALITY

The purpose of this test procedure is to proved a safe and controlled method of achieving initial criticality.

The initial conditions are: The reactor coolant system temperature and pressure is nominally 547 F° and 2235 psig. Both Reactor coolant pumps are operating, all full length rods are inserted, and rod drop tests for all rods have been completed satisfactorily. The power range high trip setpoint is set at ≤ 85% of full power.

The approach to criticality will be performed by boron dilution with the rods in the nearly full out position. An acceptable base count is established on the source range instrumentation for the Inverse Count Rate Ratio (ICRR). An initial boron concentration is also determined from a reactor coolant system sample.

The rods are then pulled out of the reactor in specified increments until they are in the nearly full out position. After each increment the count rate is recorded and a plot of ICRR vs Rod Position is maintained.

The reactor coolant is sampled every 15 minutes to determine the boron concentration. The pressurizer is sampled every 30 minutes to assure homogeneous distribution of boron in the reactor coolant. Boron dilution begins after rod withdrawal stops. Plots of ICRR vs dilution time, gallons of reactor makeup water added and boron concentration are maintained.

When criticality is achieved boron dilution is secured, and the neutron flux is stabilized about two decades above the initial critical level. The neutron flux is stabilized using RCC group D. With the reactor just critical, reactor coolant temperature and pressure, RCC positions, boron concentration, nuclear instrumentation and readings and the date and time of initial criticality are recorded.

There are no specific acceptance or review criteria for this test, as the following tests include boron concentration acceptance criteria.

2.3 <u>Determination of the Maximum Flux Level for Low Power Tests</u>

The purpose of this procedure is to establish an upper limit and the operating level of the zero power neutron flux level.

The reactor coolant system is at normal operating pressure and temperature. The reactor is critical with bank D withdrawn to the near full out position. Both reactor coolant pumps are operating.

A nominal start-up rate of .25 Decades per Minute (DPM) is established by rod withdrawal, and the neutron flux level is allowed to increase until nuclear heating is observed. The reactor is then brought to a steady state critical condition just before the point of nuclear heat addition. A plot of reactivity vs. flux is obtained by alternately withdrawing and inserting bank D in small amounts. The range of this plot is two to three decades of flux, with the point of nuclear heat addition as the maximum.

The low power physics test will be performed at flux levels below the point of nuclear heat. The maximum level will be about one decade below the first indication of reactivity feedback.

2.4 REACTIVITY COMPUTER CHECKOUT

The purpose of this procedure is to prepare and check out the reactivity computer for low power physics tests.

The reactor is just critical and the 20 reactivity constants have been entered into the reactivity program. Approximately 75 pcm of rod worth is inserted into the reactor core.

The computer is then calibrated at one reactivity value of approximately 30 pcm. This process is performed two to three times, ensuring repeatability. The positive reactivity insertions are obtained by rod withdrawal and measured via doubling time.

A review of the results is initiated if the agreement between the computer and actual values is not within 2% (nominally).

2.5 ISOTHERMAL TEMPERATURE COEFFICIENT MEASUREMENTS

The purpose of this test is to determine the temperature coefficient of reactivity for the reactor core due to moderator and doppler contributions and secondly, to determine if any control rod withdraw limits need to be imposed to ensure compliance with KNPP technical specifications.

The initial conditions are stable plant conditions with the boron concentration of the pressurizer, reactor coolant loops and volume control tank as near to the same concentration as is practical. The reactor is just critical with bank D in the near full out position.

The reactor coolant system temperature is increased or decreased at a rate of approximately 20 F^{O} per hour by manually adjusting the steam dump.

Normally the cooldown is performed first, and both a heatup and a cooldown are desired.

A plot of reactivity vs Tave is maintained during the heatup and cooldown. The isothermal temperature coefficient is the slope of the trace on this plot. See Figure 2.5-1.

The acceptance criterion for this test is Technical Specification 3.1.f.3. A review of the analytical data is performed if the measured isothermal temperature coefficient differs by ± 3 pcm/F from the predicted value.

If the test does not initially meet the acceptance criteria, the boron concentration of the RCS will be reduced by an amount that will return the isothermal temperature coefficient to within the acceptance criteria. The test will be repeated to verify the ITC is within the acceptance criteria. Administrative controls will then be establish to ensure continued compliance with KNPP technical specifications.

2.6 DELETED

2.7 ROD BANK WORTH VERIFICATION

The purpose of this test is to determine the differential boron worth over the range of RCC bank insertion, to determine the endpoint boron concentration and to infer the differential and integral worths of the RCC banks.

The initial conditions are normal operating temperature and pressure of the RCS, both reactor coolant pumps running, and the reactor is critical with the rods at the fully withdrawn position.

2.7.1 Boron Differential Worth Measurement

The reactor coolant system is sampled at 15 minute intervals and the pressurizer is sampled at 30 minute intervals to determine the boron concentration. After dilution is initiated the RCC banks are inserted a specified number steps as necessary to compensate for the reactivity change due to boron concentration changes, and to maintain the flux level within the prescribed zero power limits.

During this phase of the test a record is kept of rod position, boron concentration and reactivity scale on the reactivity meter. This information is then used with the traces on the strip chart to compute the differential boron worth over the range of RCC bank insertion. The dilution is terminated when the moving RCCA bank is near the full in position (i.e., within 100 pcm of the endpoint bank position).

2.7.2 Boron Endpoint Measurement

After the system has stabilized, the endpoint concentration is determined by insertion of the RCC bank to the full in position. The incremental worth of the RCC bank is estimated by monitoring the flux and reactivity response via the reactivity computer. This last measurement is performed approximately three times, with the incremental worth taken as the average of the three measurements. The endpoint boron concentration is measured at the specified statepoint, with slight differences in system parameters accounted for.

The boron endpoint data for the all rods out configuration is acceptable if the measured endpoint differs by less than 100 ppm from predicted. A review will be performed if the endpoint differs by more than ± 50 ppm from the predicted value.

2.7.3 Rod Worth Measurement by Boron Dilution

The Reference Bank is measured by boron dilution and the reactivity computer. The procedure is identical to the differential boron worth determination, and can be performed concurrently with it (See section 2.7.1 for test description). After the integral and differential worths are determined for the reference bank, the worths of the remaining banks are inferred from the rod swap method.

Utilization of the rod swap method requires that the worth of the reference bank be measured by boron dilution. The reference bank is defined as the bank predicted to have the highest worth. An alternate bank may be chosen as the reference bank if the use of the highest worth bank will produce unacceptable measurement errors. In the event that the results of the rod swap method fail to meet the acceptance criteria, all the remaining control bank worths and one of two of the shutdown bank worths will be verified by dilution.

2.7.4 Rod Worth Verification by Rod Swap

Rod worth verification via rod swap techniques involves the measurement of several different statepoints of the reactor. These measurements are then compared to computer predictions of the same statepoints. Good agreement between the measured and predicted statepoint values indicates that the computer model can accurately predict parameters, such as shutdown margin and bank worths.

The remaining five bank worths are inferred in the following manner. The measured reference bank is initially in a full in, or almost full in, position with the reactor just critical. The bank to be measured (bank "X") is then inserted to the full in position, while the reference bank is withdrawn to the critical position. The worth of bank X can now be inferred from the worth of the reference bank. Corrections are made to account for the spatial effects of bank X on the worth of the reference bank, and to account for the varying initial position of the reference bank.

The review criteria for rod worth verification via rod swap are:

i) The sum of the measured worths less the sum of the predicted worths for all rod banks measured is less than ± 10% of the total predicted worth.

ii) The measured worth of the reference bank is ± 10% of its predicated value.

iii) The inferred worth of an individual bank is ± 15% of its predicted value.

The acceptance criterion for rod worth verification is that the sum of the predicted worths of the measured rods less the sum of the measured worths is less than ± 10% of the total predicted worth.

3.0 Power Escalation Tests

The purpose of the power escalation tests is to obtain reactor characteristics to verify flux symmetry and core power distributions. The tests shall include as a minimum incore flux maps at a power level below or equal to 30% and at power levels of 75% and 100%. The tests shall also include nuclear instrumentation calibration, and critical boron concentration measurement at equilibrium xenon.

3.1 Flux Symmetry Tests

The flux symmetry test is conducted at a power level less than or equal to 30% of full power. The test is provided to assure that the flux profile agrees with predictions, that the core is symmetric, and that no loading errors have occurred. The test is accomplished by obtaining a flux map via the moveable incore instrumentation system, which utilizes 36 locations (thimbles) throughout the core (See Figure 2.6-1). At least 75% of the locations should be available to have a valid map. Fission chambers are used to obtain 61 data points along the axial length of each of the 36 channels. The data is then reduced through the use of the INCORE computer program.

The results of the INCORE program are then used to determine if the loading is symmetric. This is done by comparing the measured normalized reaction rate integral in symmetric thimbles. Additionally, the measured quadrant tilts is checked and reaction rate integral are compared to predictions.

The review criteria for this test are:

i) The measured normalized reaction rate difference in symmetric thimbles is less than 10%.
ii) The standard deviation of the per cent difference in the measured to predicted reaction rate integrals is less than 5%.
iii) The calculated quadrant tilt is less than 4%.

The acceptance criterion for these tests is Technical Specification 3.10.b.

3.2 Power Distribution Tests

The power distribution tests are conducted at power levels near 75% and 100% and are provided to determine if the measured and predicted core power distributions are consistent.

The power distribution is determined by incore flux maps as described in section 3.1.

The review criteria for the power profile test are:

i) The measured normalized reaction rate integral difference in symmetric thimbles is less than 6%.

ii) The standard deviation of the per cent difference of the measured to predicted reaction rate integral is less than 5%.

iii) The calculated quadrant tilt is less than 2%.

The acceptance criterion for power profile determination is Technical Specification 3.10.b.

3.3 Nuclear Instrumentation Calibration

Calibration of Nuclear Instrumentation is an integral part of the overall reactor test program. Calibration is normally performed at 75% (nominal) power by using data from one or more flux maps in accordance with approved calibration procedures.

No acceptance or review criteria are applicable for this reactor test.

3:4 Critical Boron Concentration at Equilibrium Xenon

The critical boron concentration is determined at hot-full-power at equilibrium Xenon, steady-state conditions. The concentration is determined by chemical analysis of a reactor coolant system sample.

The review criterion for critical boron concentration at hot full power is that the measured worth is ± 50 ppm of the predicted worth. The acceptance criterion is ± 100 ppm agreement.

4.0 Review and Remedial Action

Each reactor test shall be reviewed by the test engineer for results within the review and acceptance criteria specified for the test. In the event of exceeding a review criteria, the data and predictions will be reevaluated in an effort to identify any errors in data reduction or anomalies in calculational logic. This review will be presented to the Plant Operating Review Committee (PORC) prior to reaching 100% power. If an acceptance criterion for a low power test is exceeded, a review will be performed and brought before PORC prior to exceeding 5% reactor power. Reactor power shall not exceed 5% without verification of adequate shutdown margin. The technical specifications provide limiting conditions for normal operation and physics testing; compliance with these specifications will be maintained at all times.

The results of all reactor physics tests are reviewed by PORC.

5.0 Revisions

Under the provisions of 10CFR50.59(a)(1)(iii), the Kewaunee Plant is permitted to make changes in the test program which are not described in the USAR without prior commission approval, provided that the proposed revisions do not involve a change in technical specifications or any unreviewed safety question. A record of changes made to the program along with any applicable safety evaluations shall be maintained by the Kewaunee Plant.

Rod C−5

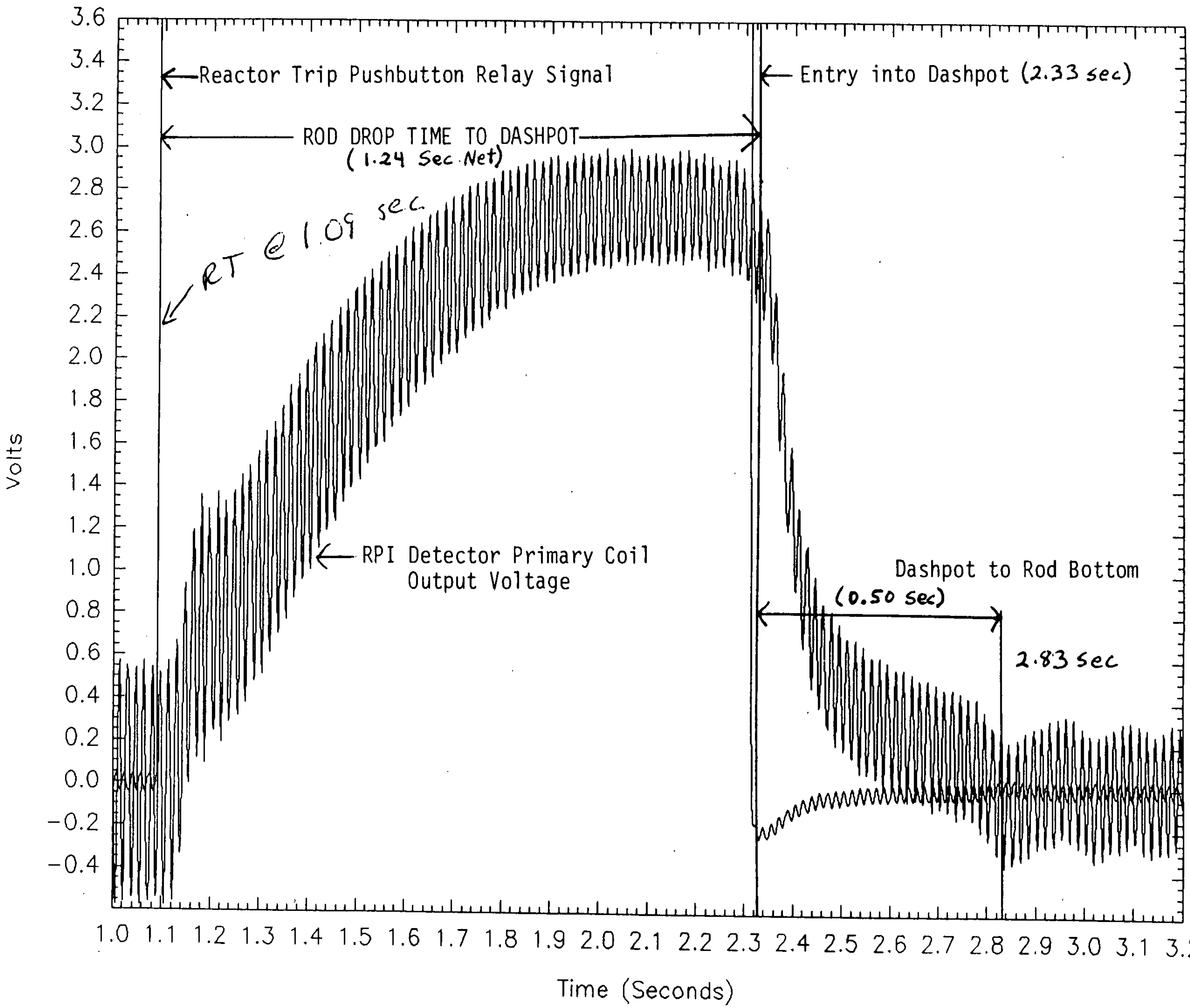

Figure 2.1-1

ISOTHERMAL TEMPERATURE COEFFICIENT

T_{ave} Start	546°F
T_{ave} End	540.5°F
Bank D	200 steps
Boron Conc.	1513 ppm

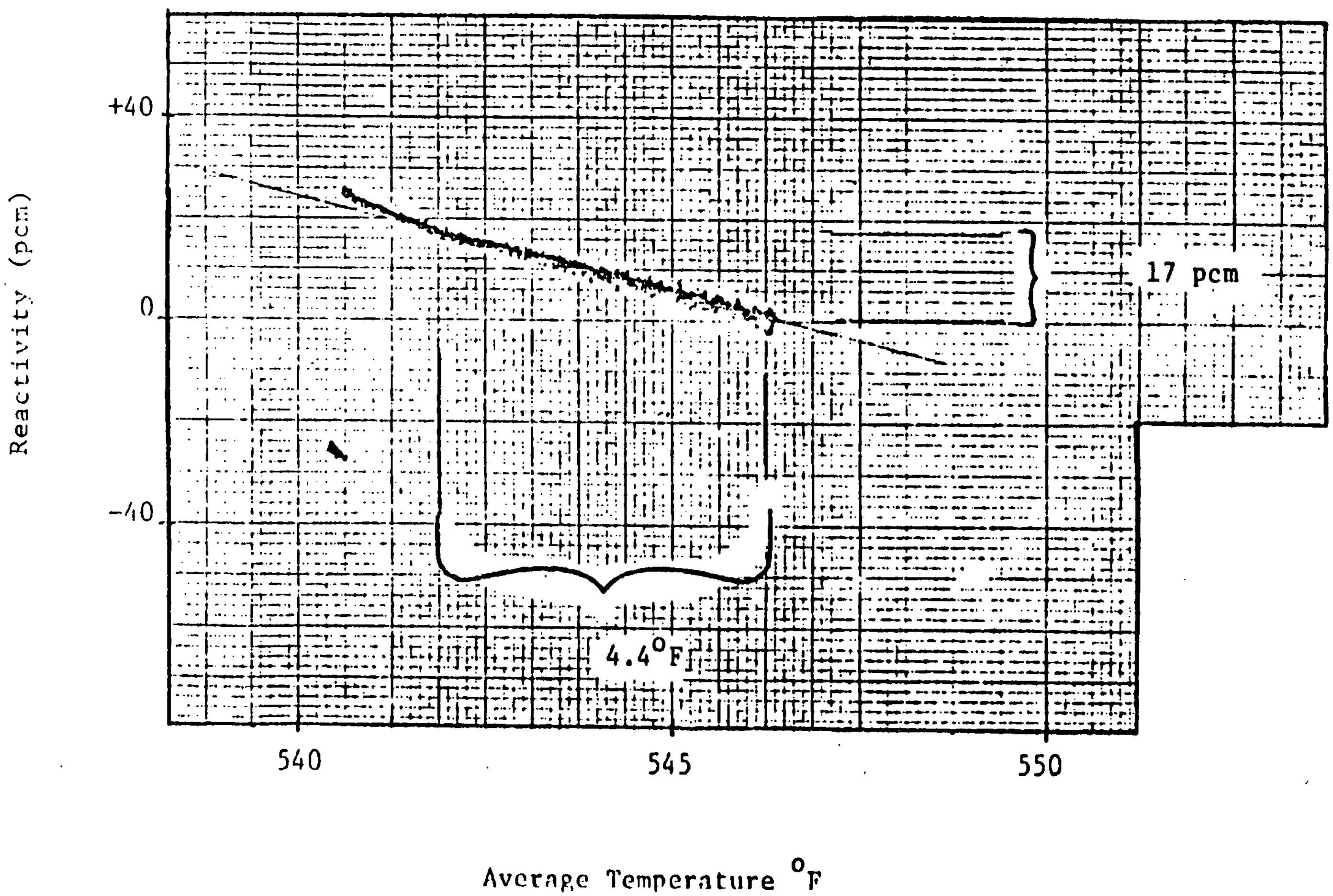

Figure 2.5-1

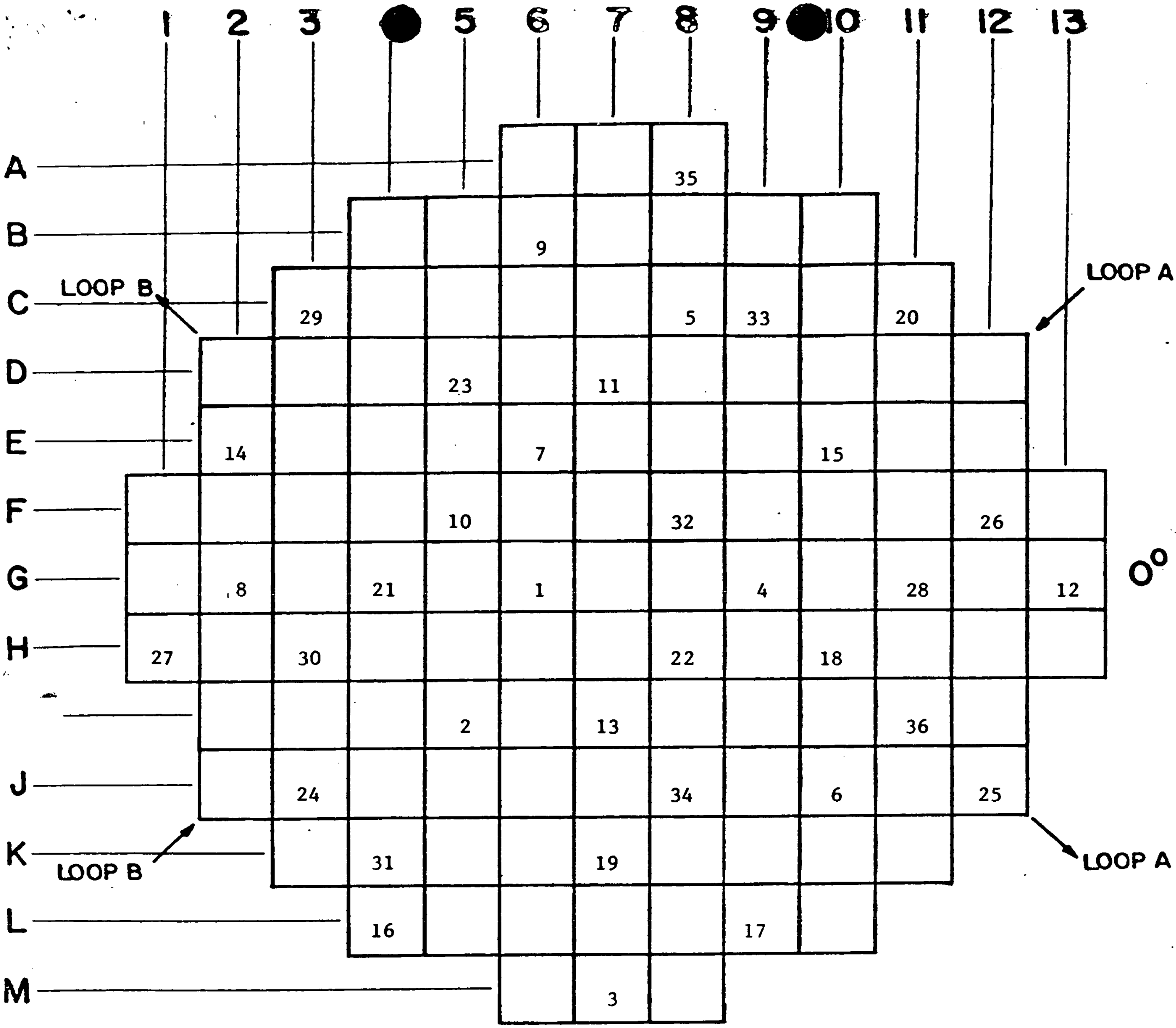

FIGURE 2.6-1 Location and I.D. Number of Moveable In-Core Fission Chambers

REACTOR TEST	REVIEW CRITERIA	ACCEPTANCE CRITERIA
Rod Drop Time	Consistent with past results	T.S. 3.10.h. : Rod Drop Time $\leq$ 1.8 Seconds
Initial Criticality	Not Applicable	Not Applicable
Maximum Low Power Flux	Not Applicable	Not Applicable
Reactivity Computer Checkout	2% Accuracy	Not Applicable
Isothermal Temperature Coefficient Determination	Measured ITC $\pm$ 3 PCM/F^{o} of predicted ITC	T.S. 3.1.f. : ITC is $\leq$ 5 PCM/F^{o}
Rod Bank Worth Measurements (Measured means inferred if rod swap method is applied)	ARO C_B $\pm$ 50 ppm of predicted value The sum of the measured worths less the sum of the predicted worths for all rod banks measured is < $\pm$ 10% of the total predicted worth. The measured worth of an individual bank is $\pm$ 15% of its predicted value. Additionally for the Rod Swap method: The measured worth of the reference bank is $\pm$ 10% of its predicted value.	ARO C_B $\pm$ 100 ppm of predicted value The sum of the predicted worths of the measured rods less the sum of the measured worths is less than $\pm$ 10% of the total predicted worth.
Flux Symmetry Test (less than or equal to 30% power)	Measured normalized reaction rate difference in symmetric thimbles is less than 10%. Standard deviation of the % difference of measured to predicted reaction rate integrals is less than 5%. Calculated quadrant tilt is less than 4%.	T.S. 3.10.b.1 : Power distribution limits
Power Distribution Tests (near 75% and 100% power)	Measured normalized reaction rate difference in symmetric thimbles is less than 6%. Standard deviation of the % difference of measured to predicted reaction rate integrals is less than 5%. Calculated quadrant tilt is less than 2%.	T.S. 3.10.b.1 : Power distribution limits
Nuclear Instrumentation Calibration	Not Applicable	Not Applicable
Equilibrium	ARO C_B $\pm$ 50 ppm of predicted value	ARO C_B $\pm$ 100 ppm of predicted value

REFERENCES

Westinghouse Electric Corporation, "Rod Exchange Technique for Rod Worth Measurement" and "Rod Worth Verification Tests Utilizing RCC Bank Interchange", submitted on Docket 50-305 via letter from Mr. E.W. James (WPSC) to Mr. A. Schwencer (NRC), May 12, 1978.

Westinghouse Electric Corporation, "Proprietary Version of Overhead Slides Used for Rod Exchange Techniques Presentation to NRC 9/29/78:, via letter NS-TMA-1973 from T.M. Anderson (Westinghouse) to P.S. Check (NRC), November 1, 1978.

Exxon Nuclear Company, Inc., "Kewaunee Nuclear Plant Cycle 5 Safety Analysis Report", XN-NF-79-27, April, 1979.

"Westinghouse Position Statement on Core Tilt", letter from R.S. Grimm (Westinghouse) to D.C. Hintz (WPSC), dated April 2, 1981.

APPENDIX A

VERIFICATION OF ROD SWAP METHODS

A.1 History

Wisconsin Public Service Corporation utilized the Rod Swap Technique for measuring rod bank worths for cycle IV startup tests in May, 1978. The data reduction was done concurrently and independently of Westinghouse Electric Corporation.

Although the WPS predictions agreed well with the measurements, and, in fact, did meet the acceptance criteria, the Westinghouse predictions were not as accurate. During the subsequent reanalysis by Westinghouse, an error was found in their work. This eventually led to a new submittal to the NRC, via Westinghouse transmittal letter N-TMA-1973, November 1, 1978.

The Westinghouse submittal referenced above includes a description of the test methods and data reduction methodology. The Technical justification for rod swap, including comparison to the boron dilution method of rod worth measurement, is included in the above referenced submittal and the submittal to the NRC entitled, "Rod Exchange Techniques for Rod Worth Measurement." This was submitted on Docket 50-305 in a letter from Mr. E.W. James (Wisconsin Public Service Corporation) to Mr. A. Schwencer (NRC) dated May 12, 1978.

The WPS staff has recalculated all of the 1978 cycle IV rod swap data following the procedure outlined in the referenced Westinghouse submittal of November 1, 1978. The results of these calculations are included within this appendix.

To further demonstrate the reliability of the WPS calculational methods, section 3.0 of this appendix includes comparisons of predictions of rod worth for cycle V with the predictions of Exxon Nuclear Company. Although this comparison does not directly indicate the reliability of the WPS calculational models, the agreement in theory with ENC and Westinghouse, and the agreement with the measurements of

Cycle IV, together demonstrate the reliability of the WPS calculational methods and models.

A.2 Cycle IV Results

Due to the proprietary nature of the calculational methods, WPS references the Westinghouse submittal to the NRC via transmittal letter N-TMA-1973, November 1978, for the details of the rod swap calculational methods.

Table A.1 includes the Westinghouse results and the WPS results for Kewaunee, BOC IV rod swap bank worth measurements. As can be seen by the table, the agreement between WPS and Westinghouse is very good.

A.3 Cycle V Prediction

Exxon Nuclear Company, the fuel supplier for KNPP Cycle V, has performed physics calculations on the KNPP reactor core independently of WPS calculations. To demonstrate the correlation of WPS methods, this section includes a table of comparisons between WPS and Exxon predictions concerning RCC Bank worths and reactivity requirements for cycle V.

Table A.2 compares predictions of total rod worth, total reactivity requirements and excess reactivity. Also included are the individual RCC bank worths determined by computer simulation of boron dilution measurements by both ENC and WPS. The Exxon values used in this table are from Kewaunee Nuclear Plant Cycle 5 Safety Analysis Report, by Exxon Nuclear Company, Inc., April, 1979 (XN-NF-79-27).

The comparisons of these predictions (as shown by table A.2) indicates that the WPS calculational model conservatively predicts rod worths within 5% of those predicted by Exxon.

The differences between requirements and shutdown margin at BOL is attributed to the fact that the minimum shutdown condition determined by WPS occurred at Hot Zero Power, with the rods at the zero power insertion limits and a negatively skewed xenon distribution. This is being compared to an Exxon full power condition with conservative requirements applied.

The minimum shutdown margin is predicted by both models to be at an end of life, hot full power condition. The respective shutdown margins are 0.574% and 0.533% reactivity, respectively; the difference amounting to only 0.041% reactivity.

Table A.1 Rod Worth Measurements, BOC IV

RCC BANK	WISCONSIN PUBLIC SERVICE Predicted Worth	WISCONSIN PUBLIC SERVICE Inferred Worths (3) Differential	WISCONSIN PUBLIC SERVICE Inferred Worths (3) Integral	WESTINGHOUSE Predicted Worth	WESTINGHOUSE Inferred Worths Differential	WESTINGHOUSE Inferred Worths Integral
CA	929	972	966	(1)	974	976
SA	660	720	705	(1)	712	717
SB	660	716	710	(1)	716	722
CB	796	677	694	(1)	694	699
CD	683	702	678	(1)	702	696
CC (2)	1043	1025	1025	(1)	1025	1025
Totals	4771	4812	4778	(1)	4822	4834

1. Westinghouse propriety information. Refer to submittal of November 1, 1978 Westinghouse Transmittal letter NS-TMA-1973, from T.M. Anderson to Paul S. Check. Information referenced is on "Summary Table (Revised)." No page number is given.

2. Control Bank C was chosen as reference bank, therefore, its worth was measured directly by boron dilution.

3. The differences between the integral and differential methods is in the approximation of the influence of the inserted bank on the reference bank. The integral method uses a correction factor formed by the ratio of two integrals, the differential method forms the same factor by a ratio of differential worths. WPS will use the integral method when the rod swap method is used for Rod Bank worth verification.

TABLE A.2

Comparisons of Predictions for Cycle V (WPS vs ENC)

RCC BANK	ENC Predicted Worth (1)	WPS Predicted Worth (1)
D	731	695
C	1386	1301
B	1012	941
A	1684	1588
Shutdown	1512	1480

BOC (2)	ENC Predicted Worth (4)	WPS Predicted Worth (5)
Total Rod Worth	6325	6005
Total Reactivity Requirements	2514	2010
Excess Reactivity	1555	1740

EOC (3)	ENC Predicted Worth (4)	WPS Predicted Worth (5)
Total Rod Worth	6658	6528
Total Reactivity Requirements	2795	2533
Excess Reactivity	574	533

1. All worths in PCM.
2. Calculated with no Xenon.
3. Calculated at equilibrium Xenon.
4. XN-NF-79-27 KNPP Cycle 5 Safety Analysis Report April, 1979. Exxon Nuclear Co.
5. Calculated at Hot Zero Power, negatively skewed Xenon distribution, Rods at ZPIL.