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LEE LIU IE-77-2255 **VICE PRESIDENT - ENGINEERING**

Mr. Edson **G.** Case, Acting Director Office of Nuclear Reactor Regulation **U.S.** Nuclear Regulatory Commission Washington, **D.C.** 20545

Dear Mr. Case:

Transmitted herewith in accordance with the requirements of 10CFR50.59 and **50.90** is an application for amendment of DPR-59, RTS-102 to incorporate proposed changes to the Technical Specifications (Appendix **A** to License) for the Duane Arnold Energy Center.

The present operating limit MCPR's result in an approximate **10%** derate during the last **1000** MWD/t exposure. Evaluation of actual scram insertion times indicates that sufficient margins exist to redefine the limiting scram curve used in the **DAEC** safety analysis. Use of the enclosed proposed Technical Specifications would essentially delete the end-of-cycle derate. Accordingly, approval of these limits would result in a savings to the public of approximately **\$1,000,000** for the remainder of the cycle.

This change would not result in any change to the presently licensed safety limit MCPR of **1.06.**

This application has been reviewed and approved **by** the **DAEC** Operations Committee and **DAEC** Safety Committee. This application does not involve a significant hazards consideration.

Three signed and notarized originals and **37** additional copies this application are transmitted herewith. This application consisting **of** the foregoing letter and enclosure hereto, is true and accurate to the best of my knowledge and belief. Three signed and notarized originals and 37 additional copies of

Vice President, Engineering

Subscribed and Sworn before me on this $\sqrt{5}$ cotday of December

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PROPOSED **CHANGE** RTS-102 TO **DAEC** TECHNICAL SPECIFICATIONS

I. Affected Technical Specifications

Appendix **A** of the Technical Specifications for the **DAEC** (DPR-49) provides as follows:

Specification **3.3.C,** Scram Insertion Times, provides average scram insertion times for various rod positions and supporting bases.

Table **3.12-2** provides MCPR limits for **7** x **7** and **8** x **8** fuel.

II. Proposed Changes in Technical Specifications

The licensees of DPR-49 propose the following changes in the Technical Specifications set forth in I above:

Delete pages **3.3-6, 3.3-17** through **3.3-22,** and 3.12-9a and re place with the attached pages.

III. Justification for Proposed Change

This change is proposed in order to provide operating margin **im** provements for **DAEC.** The safety analysis for these proposed changes is included in **NEDO-24075, 77NED354,** Class **I,** November **1977,** "Duane Arnold Energy Center Cycle **3** Safety Analysis for Application of Measured Scram Insertion Times".

IV. Review Procedure

This proposed change has been reviewed **by** the **DAEC** Operations Committee and Safety Committee which have found that this pro posed change does not involve a significant hazards consideration.

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LIMITING CONDITIONS FOR OPERATION

Scram Insertion Times **C.**

- **1.** Two specifications for scram in sertion time are provided. If the most recent available scram time data set meets Specifica tion **3.3.C.2,** the operating MCPR limit shall be as given in Table 3.12-2a. If the most recent available scram time data set does not meet Specification **3.3.C.2** but does meet Specifica tion **3.3.C.3,** the operating MCPR limit shall be as given in Table **3.12-2b.**
- 2. For application of the operating MCPR limits as specified in Table 3.12-2a, scram insertion time shall be as follows:
- a. The average scram insertion time, based on the de-energization of the scram pilot valve at time zero, of all operable control rods in the reactor power opera tion condition shall be no greater than:

b. The average scram insertion times for the three fastest control rods of all groups of four con trol rods in a 2 x 2 array shall be no greater than:

SURVEILLANCE REQUIREMENTS

C. Scram Insertion Times

- **1.** After each refueling outage all operable rods shall be scram time tested from the fully withdrawn position with the nuclear system pressure above **950** psig (with satura tion temperature) and the re quirements of Specification 3.3.B.3.a met. This testing shall be completed prior to exceeding 40% power. Below **30%** power, only rods in those sequences $(A_{12}$ and A_{34} or B_{12}
and B_{34}) which were fully withdrawn in the region from **100%** rod density to **50%** rod density shall be scram time tested. During all scram time testing below **30%** power, the Rod Worth Minimizer shall be operable or a second licensed operator shall verify that the operator at the reactor console is following the control rod program.
- 2. Whenever such scram time measurements are made (such as when a scram occurs and the computer is operable) an evaluation shall be made to provide reasonable assurance that proper control rod drive performance is being maintained.

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3.3-6a

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bypassed from the console for maintenance and/or testing. Tripping of one of the channels will block erroneous rod with drawal soon enough to prevent fuel damage. This system backs up the operator who withdraws control rods according to written sequences. The specified restrictions with one channel out of service conservatively assure that fuel damage will not occur due to rod withdrawal errors when this condition exists.

A limiting control rod pattern is a pattern which results in the core being on a thermal hydraulic limit $\lceil \text{MCPR} \rceil = 1.40$ (7 x 7) array) or **1.50 (8** x **8** array) and LHGR = **18.5** KW/ft **(7** x **7** array) or 13.4 KW/ft **(8** x **8** array) **.** During use of such patterns, it is judged that testing of the RBM system prior to withdrawal of such rods to assure its operability will assure that improper withdrawal does not occur. It is the responsibility of the Reactor Engineer to identify these limiting patterns and the designated rods either when the patterns are initially established or as they develop due to the occurrence of inoperable control rods in other than limiting patterns. Other personnel qualified to perform this function may be designated **by** the **DAEC** Chief Engineer.

3. Scram Insertion Times

The control rod system is designed to bring the reactor subcritical at a rate fast enough to prevent fuel damage; i.e., to prevent the MCPR from becoming less than the safety limit.

3.3-17

Two sets of scram insertion time specifications are provided:

- a. That specified in Section **3.3.C.2** is based on analysis of data from **DAEC** and other plants with the same control drives and is the mean of this data plus a conservatism of approximately three standard deviations. When this specification is met, the oper ating MCPR limits given in Table 2.12-2a may be applied. Analysis of the most limiting transient (Rod Withdrawal Error) under these conditions shows that MCPR remains greater than the safety limit.
- **b.** That specified in Section **3.3.C.3** is for use if Specification **3.3.C.2** cannot be met and the operating MCPR limits in Table 2.12-2a cannot be applied. If only the specification in Section 3.3.C.3 can be met, only the operating MCPR limits specified in Table **2.12-2b** are to be used. Analysis of the most limiting transient (Turbine Trip Without Bypass) under these conditions shows that MCPR remains greater than the safety limit.

After initial fuel loading and subsequent refuelings when operating above **950** psig, all control rods shall be scram tested within the constraints imposed **by** the Technical Specifications and before the 40% power level is reached.

The requirements for the various scram time measurements ensure that any indication of systematic problems with rod drives will be investi gated on a timely basis.

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3.3 AND 4.3 **REFERENCES**

1. Duane Arnold Energy Center Cycle **3** Safety Analysis for Application of Measured Scram Insertion Times, NEDO-24075, **77NED354,** Class I, November **1977.**

TABLE **3.12-2**

MCPR LIMITS

TABLE 3.12-2a

(For application only if scram time Specification **3.3.C.2** is met)

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TABLE **3.12-2b**

(For application if scram time Specification **3.3.C.2** is not met)

NEDO-24075 77NED354 Class I November **1977**

DUANE ARNOLD ENERGY **CENTER**

UNIT **1**

CYCLE 3 SAFETY ANALYSIS

APPLICATION OF **MEASURED** SCRAM INSERTION TIMES

BOILING WATER REACTOR **PROJECTS** DEPARTMENT *** GENERAL** ELECTRIC COMPANY **SAN JOSE, CALIFORNIA 95125**

IMPORTANT NOTICE REGARDING **CONTENTS** OF THIS REPORT

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NEDO-24075

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6. REFERENCES

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LIST OF ILLUSTRATIONS

LIST OF **TABLES**

NEDO-24075

1. INTRODUCTION **AND** SUMMARY

Reference **1** contained the safety analysis for the Duane Arnold Energy Center **(DAEC)** cycle **3** based on scram insertion times as given **by** the Technical Speci fications. Scram data from operating plants had indicated that these scram times are quite conservative; however, a sufficient data base with supporting statistical analysis to justify the use of more realistic scram time in plant safety analyses did not exist.

As part of a continuing program to provide operating margin improvements for **DAEC** to enable continued full power operation, operating data was collected and the necessary statistical analysis completed. From this analysis a revised scram insertion time specification was derived which would be unlikely to be exceeded during any scram.

This report describes the scram data base and statistical analysis, identifies the proposed scram insertion time limit and presents the results of the safety analysis which defines the MCPR operating limit based on the revised scram insertion time limit.

2. SCRAM INSERTION TIME ANALYSIS

Control rod scram time data from two similar operating BWR/4's were used to derive a more realistic scram insertion time specification to be used in the **DAEC** safety analysis to define the operating MCPR limit. The collection of the data is described in Section 2.1.

2.1 Data Base

The **DAEC** data base included four full core **(89** control rod drives) individual drive scram tests over a four year operating period **(1** full core scram test per year). Scram times were recorded at four insertion positions **(=5%,** 20%, **50%** and **90%** insertion) for each individual control rod drive. **DAEC** scram times were also available from **8** full core reactor scrams in which the scram times were recorded for approximately 20 drives per reactor scram. This pro vides a data base of over **500** rod scram times specifically applicable to **DAEC.**

Scram time data from another BWR operating plant similar to **DAEC** (BWR/4 plant with the same number of control rods) with an identical control rod drive de sign were also used in the analysis to obtain a better estimate of the scram time variation between tests. This data base included scram times from **15** scram tests conducted over a two year period. Two of the **15** scram tests were full core **(89** control rod drives) individual drive scram tests. The remaining **13** scram tests were from full core reactor scram tests in which the scram times were recorded for approximately 45 drives per reactor scram. Thus, over **1150** rod scram times were to derive a more realistic scram time to be used in the plant safety analysis.

2.2 SUMMARY OF RESULTS

The core average scram insertion time specification assumed in safety analysis to determine the MCPR operating limit for each insertion position is greater than the measured **DAEC** average scram insertion time plus three standard devia tions for the region of greatest importance (less than **50%** inserted). The proposed average scram time specification for the three fastest control rods in a 2x2 array is greater than the measured **DAEC** average scram insertion time

plus **2.6** standard deviations for this same region. The probability of ex ceeding the proposed specification limits is, therefore, acceptably low (probability **<1%)** and is unlikely to be exceeded during any scram.

2.3 CORE AVERAGE SCRAM INSERTION TIME SPECIFICATION

- a. The proposed core average scram insertion time specification for each insertion position has been selected so that it is unlikely that the specification would be exceeded. The actual calculated difference between the proposed specification and the measured aver age (in terms of number of standard deviations) for each insertion position is given in Figure 2-1.
- **b.** The **DAEC** average scram insertion time was calculated from the four full core individual drive tests. The data from these tests are the most representative of the population average since each of the four tests included scram times for all drives in the core. The distri bution of these data is depicted in Figures **2-3,** 2-4, **2-5** and **2-6.**
- c. The standard deviation for each insertion position was calculated from the average scram insertion times of the four full core indi vidual drive scram tests and the eight full core scrams at **DAEC.**
- **d.** The standard deviations calculated from the **DAEC** core average data are consistent with the standard deviations experienced at the other BWR.
- 2.4 AVERAGE SCRAM INSERTION TIME SPECIFICATION FOR THE THREE **FASTEST** CONTROL RODS IN **A** 2x2 ARRAY
	- a. The proposed specification for the average scram insertion time of the three fastest control rods in a 2x2 array is greater than the **DAEC** measured average scram insertion times **by** more than **2.5** standard deviations. The lower bound of the difference between the proposed specification and the measured average (in terms of number of standard deviations) for each insertion position is given in Figure 2-2.

- **b.** The **DAEC** average scram insertion time of the fastest **3** rods in a 2x2 array was assumed to be equal to the average calculated for the core average scram insertion time specification. The real average of the fastest **3** rods in a 2x2 array would be less, and therefore, this is a conservative assumption. The data for the **3** fastest rods in all 2x2 arrays is shown in Figures **2-6, 2-7, 2-8,** and **2-9.**
- c. The standard deviations used for this part of the analysis were cal culated from the **DAEC** measured distribution of individual drive scram times. The standard deviation for the distribution of the averages of the three fastest control rods in a 2x2 array would be less than the calculated standard deviation of scram insertion times for individual drives. **A** precise calculation of the standard deviation of the average of the three fastest scram insertion times in a 2x2 array is not necessary since the average of the individual drive scram insertion times plus three standard deviations is approximately equal to the pro posed specification. Therefore, there is a low probability **(<1%)** of exceeding the proposed technical specification for the average scram time of the three fastest control rods in a 2x2 array.
- **d.** The standard deviations calculated from the **DAEC** individual drive measurements are consistent with the standard deviations experienced at the other BWR.

2.5 PROPOSED TECHNICAL SPECIFICATION SCRAM INSERTION TIME REQUIREMENT

The proposed new scram insertion time specification is given in Table 2-1.

Table 2-1

PROPOSED SCRAM TIME TECHNICAL SPECIFICATION

Average of Fastest

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Figure $2-2$. Scram Insertion Times, DAEC, Average of Fastest Three out of Four Control Rods in Any 2x2 Array

Figure **2-3.** Histogram of **DAEC** Full Core Individual Drive Scram Insertion Time Data

Figure 2-4. Histogram of **DAEC** Full Core Individual Drive Scram Insertion Time Data

NEDO-24075

Figure **2-5.** Histogram of **DAEC** Full Core Individual Drive Scram Insertion Time Data

Figure **2-6.** Histogram of **DAEC** Full Core Scram Insertion Time Data

NEDO-24075

PROPOSED SPECIFICATION = 2.847 sec

PROPOSED SPECIFICATION = 1.556 sec

Figure 2-7. Histogram of DAEC Full Core Scram Insertion Data - Average of Fastest Three Control Rods in a 2x2 Array - Position 06

PROPOSED SPECIFICATION = 0.383 sec

PROPOSED SPECIFICATION = 0.972 sec

3. THERMAL-HYDRAULIC **ANALYSES**

Discussions of thermal-hydraulic design requirements, hydraulic models, statistical analysis and uncertainties, and thermal hydraulics of mixed core loading are given in Section 4 of Reference 2. The analysis applicable to Duane Arnold Cycle **3,** is given below and in References **1, 3** and 4.

3.1 STATISTICAL ANALYSIS

The statistical analysis is described in Reference **3.**

3.1.1 Fuel Cladding Integrity Safety Limit

The fuel cladding integrity safety limit is a MCPR of **1.06.**

3.1.2 Basis for Statistical Analyses

The basis for the statistical analysis is described in Reference **3.**

3.2 ANALYSIS OF ABNORMAL OPERATIONS TRANSIENTS

The results of the most limiting pressure and power increase transients were evaluated to determine the largest decrease in MCPR. Other types of transients have an insignificant effect upon critical power and are, therefore, not reviewed in depth. The results of the transients analyzed are summarized in Table **3-1.**

Addition of the ACPR to the Safety Limit MCPR gives the minimum operating MCPR required to avoid violating the Safety Limit should this limiting transient occur.

3.2.1 Operating Limit MCPR

Based on the fuel cladding integrity safety limit and the results of the abnormal operational transient analyses, the operating limit MCPR is 1.21 for 7x7 and 1.22 for 8x8 fuels.

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3.3 TRANSIENT ANALYSIS INITIAL CONDITION PARAMETERS

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The magnitude of values used as initial input conditions for the transient analysis is shown in Table **3-2.**

Table **3-1**

SUMMARY OF **RESULTS** LIMITING ABNORMAL OPERATIONAL ACPR TRANSIENTS

Table **3-2**

GETAB TRANSIENT ANALYSIS INITIAL CONDITION PARAMETERS

*Results of bounding analysis from Reference **1.**

4. ABNORMAL OPERATING TRANSIENTS

4.1 TRANSIENTS **AND** CORE DYNAMICS

4.1.1 Analysis Basis

This subsection contains the analyses of the most limiting abnormal operational transients for Duane Arnold Energy Center Cycle **3** using the proposed new scram insertion time specification. The control rod drive specifications are given in Figure 4-4.

4.1.2 Input Data and Operating Conditions

The input data and operating conditions are shown in Table 4-1 and represent the nominal basis for these analyses. Each transient is considered at these conditions unless otherwise specified.

4.1.3 Transient Summary

A summary of the transients analyzed and their consequences is provided in Table 4-2.

4.2 TRANSIENT DESCRIPTIONS

The abnormal operating transients which are limiting according to safety criteria and which also are sensitive to nuclear core parameter changes have been analyzed and are evaluated in the following narrative.

4.2.1 Turbine Trip With Failure of the Bypass Valves

The primary characteristic of the turbine trip without bypass is a pressure increase due to the obstruction of steam flow **by** the turbine stop valves. The pressure increase causes a significant void reduction which yields a pronounced positive void reactivity effect. Core net reactivity is.sharply positive and causes a rapid increase in neutron flux until the net reactivity is forced negative **by** the scram initiated from the position switches on the turbine stop valves.

This unlikely event would produce a transient as shown in Figure 4-1. The initial reactor power is at a level corresponding to **105%** of rated steam flow, the neutron flux peaks at 249% initial, the average surface heat flux peaks at 104% of initial.

The peak streamline pressure is limited to **1171** psig as a result of the high pressure actuation of the six safety/relief valves which provides a 69-psi margin to the 1240-psig set point of the first spring safety valve.

4.2.2 Loss of a Feedwater Heater

The loss of a feedwater heater was analyzed in Reference **1.** This analysis is consevative for the new scram insertion time. Since the loss of feedwater heater does not affect the MCPR limit this transient was not reanalyzed.

4.2.3 Rod Withdrawal Error

The rod withdrawal error was analyzed for the fully drilled core (most conserva tive case). The results were not measurably different from those presented in Reference **3;** therefore the analysis presented in Reference **3** is applicable to the half-drilled core. The rod withdrawal error analysis is unchanged **by** the control rod scram insertion time.

4.2.4 Turbine Trip With Operable Bypass

^Avariety of turbine or nuclear system malfunctions will initiate a turbine trip. Some examples are: moisture separator and heater drain tank high levels, large vibration, loss of control fluid pressure, loss of condenser vacuum and reactor high water level.

The following sequence of events occurs for a turbine trip:

a. The turbine stop valves close over a period of approximately **0.1** second.

- **b. A** reactor scram is initiated from position switches on the turbine stop valves at **10%** closure.
- c. The turbine bypass valves are opened **by** the turbine control system. Delay after start of stop valve closure is **0.1** second.
- **d.** The pressure continues to rise until the pressure relief set points are reached, some or all of the safety/relief valves briefly discharge steam to the suppression pool.

This event would produce a transient as shown in Figure 4-2. The initial reactor power is at a level corresponding to **105%** of NBR steam flow, the neutron flux peaks at 140% of initial, the average surface heat peaks at **100%** initial.

The peak streamline pressure is limited to **1137** psig as a result of the high pressure actuation of the six safety/relief valves, which provides a 103-psi margin to the 1240-psig set point of the first spring safety valve.

4.2.5 Feedwater Controller Failure

An event that can directly cause excess coolant inventory is one in which feed water flow is increased. The most severe applicable event in a feedwater controller failure in the maximum demand direction. The transient was initiated from a level corresponding to **105%** of NBR steam flow. The feedwater controller was assumed to fail such as to demand maximum feedwater valve opening resulting in a maximum runout flow of **135%** of NBR rated feedwater flow at a system pressure of **1060** psig. With excess feedwater flow, the water level rises to the high level trip setpoint, at which time the main turbine and feedwater pumps are tripped and a reactor scram is initiated. Figure 4-3 shows the results of this transient. The neutron flux peaks at **153%** of initial and the average surface heat flux peaks at 104% initial.

The peak streamline pressure is limited to **1138** psig as a result of the high pressure actuation of the six safety/relief valves, which provides a 102-psi margin to the 1240-psig set point of the first spring safety valve.

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Table 4-1 TRANSIENT INPUT PARAMETERS

Table 4-2

TRANSIENT **DATA SUMMARY**

*Results of bounding analysis from Reference **1.**

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Figure 4-3. Feedwater Controller Failure Maximum Demand With High Level Turbine Trip

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5. TECHNICAL SPECIFICATION **CHANGES**

The following technical specification changes will be required.

a. MCPR Operating Limit

b. Scram Insertion Times

6. REFERENCES

- **1.** "General Electric Boiling Water Reactor, Reload Number 2 Licensing Submittal Supplement **1,** Partially Drilled Core, Duane Arnold Energy Center," Supplement **1,** June **1977, (NEDO-21082-02-1).**
- 2. GE/BWR Generic Reload Licensing Application for 8x8 fuel, Rev. **1,** Supplement 4, April **1976 (NEDO-20360).**
- **3.** General Electric Boiling Water Reactor Reload 2 Licensing Submittal Duane Arnold Energy Center, January **1977 (NEDO-21082-02).**
- 4. Safety Evaluation, Safety/Relief Valve Replacement, Duane Arnold Energy Center, May **1977.**

NUCLEAR ENERGY DIVISIONS * GENERAL ELECTRIC **COMPANY SAN JOSE, CALIFORNIA 95125**

TECHNICAL INFORMATION **EXCHANGE** TtTLE **PAGE**

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