

LICENSEE EVENT REPORT

Cause Description and Corrective Actions:

NSP/GE discussions regarding the Extended Burnup Program originated in 1978. During the first half of 1979 MAPIGR analysis was completed by GE for the Reload 2 fuel (designations 'MTB') to extend exposure from 30,000 MW/ST to 45,000 MW/ST. Results were submitted to NSP in a DRAFT report (NIRK-24202) dated June, 1979. Subsequent to the required NSP reviews, the report was submitted to NRC dated September 17, 1979. Discussions in December, 1979 with NRC regarding the current and expected maximum bundle average, maximum average planar, and maximum local pellet exposures led to the observation that EX-7 exposures, as projected by (M), appeared to be high. Specifically, maximum average planar exposure of 38,360 MW/ST converted to 34,870 MW/ST, and this was above the highest value listed in the MAPIGR table (table 3.11.1 in the Technical Specifications) applicable to the current operating cycle (7). It was confirmed by interrogating various process computer edits and DUCLE edits that current nodal exposures at several core locations were above 30,000 MW/ST.

DUCLE (Backup Core Limits Evaluation) edits are obtained from the GE Mark III System approximately twice each month. DUCLE automatically prints out the highest nodal exposure in the core, information which is also available via the process computer (P/C), but not directly edited by any program. A review of DUCLE edits indicates peak nodal exposure on April 11, 1979 below 30,000 MW/ST and on May 1 it was at 30,028 MW/ST. Therefore, May 1 may be indicated as the time in CYCLE 7 when planar exposure first exceeded 30,000 MW/ST.

Evaluation of actual MAPIGR data from the P/C for Reload 2 (MTB fuel) while the plant was operating at or near 100% power indicates the following:

<u>DATE</u>	<u>MAPIGR</u> (kw/ft.)	<u>NODAL EXPOSURE</u> (MW/ST)	<u>CORE LOCATION</u>
5-2-79	8.14	25,881	41,28,6
6-1-79	8.06	26,749	41,28,5
7-2-79	7.55	25,911	11,28,5
8-1-79	6.97	26,655	11,28,4
9-5-79	6.97	27,633	35,24,17
10-1-79	6.91	26,872	37,26,15
11-2-79	7.81	27,283	37,26,16
12-3-79	6.96	28,521	37,26,15
12-10-79	7.11	28,683	37,26,15
12-17-79	6.79	28,864	37,26,15

The Extended Burnup Program MAPIGR analysis for MTB fuel indicates a maximum allowable value of 9.8 kw/ft. at 35,000 MW/ST. The information above then suggests two things:

1. At no time since 30,000 MW/ST was exceeded did the MAPIGR exceed the analyzed limit; thus, no Limiting Condition for Operation (LCO) was violated.
2. The MAPIGR always occurred at core locations having lower exposure than the peak exposure; specifically, the exposures in locations where MAPIGR has occurred for the MTB fuel have continually been below 30,000 MW/ST since May 1, 1979.

Because of the above two conclusions, the occurrence has no consequence from the standpoint of public health and safety.

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Corrective action has been completed as follows:

1. The plant process computer has been reprogrammed for 9.8 kw/ft at 35,000 MW/ST and for 8.9 kw/ft at 40,000 MW/ST. This corrects the current situation with adequate exposure margin through the end of the current operating cycle.

The bases for these changes are contained in GE document NEDX-24202, which has been submitted to NRC in a License Amendment Request dated September 21, 1979, in support of the Extended Burnup Program at Monticello scheduled to begin with the upcoming operating cycle in 1980.

NOTE: A check of bundle and nodal exposure arrays has been completed for all other fuel types in the core with the determination that no other fuel type will exceed 30,000 MW/ST through the remainder of the current operating cycle.

2. A Technical Specification License Amendment Request dated December 21, 1979, has been submitted to change Table 3.11.1 by adding the values shown in 1., above.
3. A letter has been written to GE requesting determination that review methods be revised to assure prevention of a similar future occurrence. Additionally, the letter suggests a permanent software change to the process computer to edit maximum planar exposure for each fuel type, as well as the currently programmed maximum value of planar exposure, with each MA/LEBR interrogation of the computer by operating personnel.
4. The monthly Reactivity Anomaly surveillance test completed by the nuclear engineers and reviewed by the Supt., Technical Engineering, has been revised to include a verification, with documentation, that the maximum planar exposure of each fuel type in the core is less than the maximum value listed in Technical Specification Table 3.11.1.