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L-2012-356 10 CFR 50.36

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

Re: Turkey Point Unit 4 Docket No. 50-251 <u>Revised Core Operating Limits Report</u>

References:

- 1. Letter from M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-180), "Turkey Point Unit 4 Revised Core Operating Limits Report," April 21, 2012.
- Letter from M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-355), "Turkey Point Unit 4, Nuclear Fuel Pellet Thermal Conductivity Degradation Impact on Current Turkey Point Unit 4 Cycle 26 BE LOCA Analysis Using the 1996 CQD Methodology – 10 CFR 50.46 30-Day Special Report," October 3, 2012.

Florida Power & Light (FPL) letter L-2012-180 (Reference 1), submitted a revision to the Unit 4 Cycle 26 Core Operating Limits Report (COLR) due to implementation of Amendment 243.

In accordance with Technical Specification 6.9.1.7, the attached revised Core Operating Limits Report (COLR) is provided for Turkey Point Unit 4 Cycle 26, superseding the COLR transmitted by Reference 1. The revision to the Turkey Point Unit 4 Cycle 26 COLR includes changes to accommodate the impact of the fuel pellet thermal conductivity degradation (TCD) as described in Reference 2.

Should there be any questions, please contact Robert Tomonto, Licensing Manager, at 305-246-7327.

Very truly yours,

En: Mary for M. Kiley

Michael Kiley Site Vice President Turkey Point Nuclear Plant

Attachment

cc: Regional Administrator, Region II, USNRC Senior Resident Inspector, USNRC, Turkey Point Plant

Appendix A

Revised

Turkey Point Unit 4 Cycle 26 Core Operating Limits Report (COLR)

1.0 INTRODUCTION

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This Core Operating Limits Report for Turkey Point Unit 4 Cycle 26 has been prepared in accordance with the requirements of Technical Specification 6.9.1.7.

The Technical Specifications (TS) affected by this report are listed below with the section and page for each one of the TS addressed in this COLR document.

<u>Sectio</u>	<u>Page</u>		
2.1	2.1.1	Reactor Core Safety Limits	14B-A3
2.2	2.2.1	Reactor Trip System Instrumentation Setpoints, Table 2.2-1, Notes 1 & 3	14B-A3-14B-A4
2.3	3.1.1.1	Shutdown Margin Limit for MODES 1, 2, 3, 4	14B-A4
2.4	3.1.1.2	Shutdown Margin Limit for MODE 5	14B-A4
2.5	3.1.1.3	Moderator Temperature Coefficient	14B-A4
2.6	4.1.1.3	MTC Surveillance at 300 ppm	14B-A4
2.7	3.1.3.2	Analog Rod Position Indication System	14B-A5
2.8	3.1.3.6	Control Rod Insertion Limits	14B-A5
2.9	3.2.1	Axial Flux Difference	14B-A5
2.10	3.2.2	Heat Flux Hot Channel Factor F _Q (Z)	14B-A5
2.11	3.2.3	Nuclear Enthalpy Rise Hot Channel Factor	14B-A5
2.12	3.2.5	DNB Parameters	14B-A5
Figure		Description	
A1		Reactor Core Safety Limit – Three Loops in Operation	14B-A6
A2		Required Shutdown Margin vs Reactor Coolant Boron Concentration	14B-A7
A3		Turkey Point Unit 4 Cycle 26 Rod Insertion Limits vs Thermal Power	14B-A8
A4		Axial Flux Difference as a Function of Rated Thermal Power	14B-A9

2.0 OPERATING LIMITS

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The cycle-specific parameter limits for the specifications listed in the Introduction are presented below and listed sequentially by Technical Specification (TS). These limits have been developed using the NRC-approved methodologies specified in TS 6.9.1.7.

2.1 Reactor Core Safety Limits – Three Loops in Operation (TS 2.1.1)

- **Figure A1**(page 14B-A6) In Modes 1 and 2, the combination of Thermal Power, reactor coolant system highest loop average temperature and pressurizer pressure shall not exceed the limits in Figure A1.

2.2 Reactor Trip System Instrumentation Setpoints (TS 2.2.1)

NOTE 1 on TS Table 2.2-1 Overtemperature ΔT

- $\tau_1 = 0$ s, $\tau_2 = 0$ s Lead/Lag compensator on measured ΔT
- $\tau_3 = 0s$ Lag compensator on measured ΔT
- $K_1 = 1.24$
- $K_2 = 0.017/^{\circ}F$
- $\tau_4 = 25s$, $\tau_5 = 3s$ Time constants utilized in the lead-lag compensator for T_{avg}
- $\tau_6 = 0s$ Lag compensator on measured T_{avg}
- $T' \leq 577.2 \,^{\circ}F$ Nominal T_{avg} at RATED THERMAL POWER
- $K_3 = 0.001/psig$
- **P'** ≥ **2235 psig** Nominal RCS operating pressure
- $f_1(\Delta I) = 0$ for $q_t q_b$ between 50% and + 2%.

For each percent that the magnitude of $q_t - q_b$ exceeds – 50%, the ΔT Trip Setpoint shall be automatically reduced by 0.0% of its value at RATED THERMAL POWER; and

For each percent that the magnitude of $q_t - q_b$ exceeds + 2%, the ΔT Trip Setpoint shall be automatically reduced by 2.19% of its value at RATED THERMAL POWER.

Where q_t and q_b are percent RATED THERMAL POWER in the top and bottom halves of the core respectively, and $q_t + q_b$ is total THERMAL POWER in percent of RATED THERMAL POWER.

NOTE 3 on TS Table 2.2-1 Overpower △T

-	K₄ ≤ 1.10	
-	$\begin{array}{l} K_5 \geq 0.02/^{\circ}F \\ K_5 \texttt{=} 0.0 \end{array}$	For increasing average temperature For decreasing average temperature
-	$\tau_7 \ge 10 \text{ s}$	Time constants utilized in the lead-lag compensator for T_{avg}
-	K ₆ = 0.0016/°F K ₆ = 0.0	For T > T" For T \leq T"
-	T" ≤ 577.2°F	Nominal Tavg at RATED THERMAL POWER
-	f₂ (∆l) = 0	For all ∆l

- 2.3 Shutdown Margin Limit for MODES 1, 2, 3 and 4 (TS 3.1.1.1)
 - Figure A2 (page 14B-A7)

2.4 Shutdown Margin Limit for MODE 5 (TS 3.1.1.2)

- ≥1% ∆k/k

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2.5 Moderator temperature coefficient (MTC) (TS 3.1.1.3)

- ≤ + 5.0 x 10⁻⁵ Δk/k/°F BOL, HZP, ARO and from HZP to 70% Rated Thermal Power (RTP)
- From 70% RTP to 100% RTP the MTC decreasing linearly from ≤ + 5.0 x 10⁻⁵ ∆k/k/°F to < 0.0 x 10⁻⁵ ∆k/k/°F
- Less negative than 35.0 x $10^{-5} \Delta k/k/^{\circ}F$ EOL, RTP, ARO

2.6 Moderator temperature coefficient (MTC) Surveillance at 300 ppm (TS 4.1.1.3)

-	Less negative than - 30.0 x 10 ⁻⁵ ∆k/k/°F	Within 7 EFPD of reaching
		equilibrium boron concentration of 300 ppm.

2.7 Analog Rod Position Indication System (TS 3.1.3.2)

- **Figure A3** (page 14B-A8) The All Rods Out (ARO) position for all shutdown Banks and Control Banks is defined to be 228 steps withdrawn.

2.8 Control Rod Insertion Limits (TS 3.1.3.6)

- **Figure A3** (page 14B-A8) The control rod banks shall be limited in physical insertion as specified in Figure A3 for ARO =228 steps withdrawn.

2.9 Axial Flux Difference (TS 3.2.1)

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- Figure A4 (page 14B-A9)

2.10 Heat Flux Hot Channel Factor $F_Q(Z)$ (TS 3.2.2)

- $[FQ]^{L} = 2.47$
- K(z) = 1.0 For $0' \le z \le 12'$ where z is core height in ft
- 2.11 Nuclear Enthalpy Rise Hot Channel Factor (TS 3.2.3)
 - $F_{\Delta H}^{RTP} = 1.63$ - $PF_{\Delta H} = 0.3$
- 2.12 DNB Parameters (TS 3.2.5)
 - RCS Tavg < 581.2 °F
 - Pressurizer Pressure > 2200 psig



FIGURE A1

Reactor Core Safety Limit – Three Loops in Operation

14B-A6



FIGURE A2

Required Shutdown Margin vs Reactor Coolant Boron Concentration

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FIGURE A3

Turkey Point Unit 4 Cycle 26 Rod Insertion Limits vs Thermal Power ARO = 228 Steps Withdrawn, Overlap = 100 Steps



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FIGURE A4

Axial Flux Difference as a Function of Rated Thermal Power Turkey Point Unit 4 Cycle 26

