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U.S. Nuclear Regulatory Commission
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Subject: Duke Energy Carolinas, LLC
Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
Technical Specification Bases Changes

Pursuant to 10CFR 50.4, please find attached changes to the Catawba Nuclear Station Technical Specification Bases. These Bases changes were made according to the provisions of Technical Specification 5.5.14, "Technical Specifications (TS) Bases Control Program."

Any questions regarding this information should be directed to Larry Rudy, Regulatory Affairs, at (803) 701-3084.

I certify that I am a duly authorized officer of Duke Energy Carolinas, LLC, and that the information contained herein accurately represents changes made to the Technical Specification Bases since the previous submittal.

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Attachment

A001
MR

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B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.3 Moderator Temperature Coefficient (MTC)

BASES

BACKGROUND

According to GDC 11 (Ref. 1), the reactor core and its interaction with the Reactor Coolant System (RCS) must be designed for inherently stable power operation, even in the possible event of an accident. In particular, the net reactivity feedback in the system must compensate for any unintended reactivity increases.

The MTC relates a change in core reactivity to a change in reactor coolant temperature (a positive MTC means that reactivity increases with increasing moderator temperature; conversely, a negative MTC means that reactivity decreases with increasing moderator temperature). The reactor is designed to operate with a negative MTC over the largest possible range of fuel cycle operation. Therefore, a coolant temperature increase will cause a reactivity decrease, so that the coolant temperature tends to return toward its initial value. Reactivity increases that cause a coolant temperature increase will thus be self limiting, and stable power operation will result.

MTC values are predicted at selected burnups during the safety evaluation analysis and are confirmed to be acceptable by measurements. Both initial and reload cores are designed so that the MTC is less than zero when THERMAL POWER is at RTP. The actual value of the MTC is dependent on core characteristics, such as fuel loading and reactor coolant soluble boron concentration. The core design may require additional fixed distributed poisons to yield an MTC at or near BOC within the range analyzed in the plant accident analysis. For some core designs, the burnable absorbers may burn out faster than the fuel depletes early in the cycle. This may cause the boron concentration to increase with burnup early in the cycle and the most positive MTC not to occur at BOC, but somewhat later in the cycle. For these core designs, the predicted difference between the BOC MTC and the most positive MTC is considered to ensure that the MTC remains less than the limit during the entire cycle. The end of cycle (EOC) MTC is also limited by the requirements of the accident analysis. Fuel cycles that are designed to achieve high burnups or that have changes to other characteristics are evaluated to ensure that the MTC does not exceed the EOC limit.

The limitations on MTC are provided to ensure that the value of this coefficient remains within the limiting conditions assumed in the UFSAR accident and transient analyses.

BASES

BACKGROUND (continued)

If the LCO limits are not met, the unit response during transients may not be as predicted. The core could violate criteria that prohibit a return to criticality, or the departure from nucleate boiling ratio criteria of the approved correlation may be violated, which could lead to a loss of the fuel cladding integrity.

The SRs for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits, since this coefficient changes slowly, due principally to changes in RCS boron concentration associated with fuel and burnable absorber depletion.

APPLICABLE
SAFETY ANALYSES

The acceptance criteria for the specified MTC are:

- a. The MTC values must remain within the bounds of those used in the accident analysis (Ref. 2); and
- b. The MTC must be such that inherently stable power operations result during normal operation and accidents, such as overheating and overcooling events.

The UFSAR, Chapter 15 (Ref. 2), contains analyses of accidents that result in both overheating and overcooling of the reactor core. MTC is one of the controlling parameters for core reactivity in these accidents. Both the most positive value and most negative value of the MTC are important to safety, and both values must be bounded. Values used in the analyses consider worst case conditions to ensure that the accident results are bounding (Ref. 2).

The consequences of accidents that cause core overheating must be evaluated when the MTC is positive. Such accidents include the rod withdrawal transient from any power level (Ref. 3), turbine trip, and loss of forced reactor coolant flow. The consequences of accidents that cause core overcooling must be evaluated when the MTC is negative. Such accidents include sudden feedwater flow increase and steam line break.

In order to ensure a bounding accident analysis, the MTC is assumed to be its most limiting value for the analysis conditions appropriate to each accident. The bounding value is determined by considering rodded and unrodded conditions, whether the reactor is at full or zero power, and whether it is the BOC or EOC life. The most conservative combination appropriate to the accident is then used for the analysis (Ref. 2).

BASES

APPLICABLE SAFETY ANALYSES (continued)

MTC values are bounded in reload safety evaluations assuming steady state conditions at BOC and EOC. An EOC measurement or analytical check (Ref. 5) of the EOC MTC is conducted at conditions when the RCS boron concentration reaches approximately 300 ppm. The measured or calculated value may be extrapolated to project the EOC value, in order to confirm reload design predictions.

MTC satisfies Criterion 2 of 10 CFR 50.36 (Ref. 4). Even though it is not directly observed and controlled from the control room, MTC is considered an initial condition process variable because of its dependence on boron concentration.

LCO

LCO 3.1.3 requires the MTC to be within specified limits of the COLR to ensure that the core operates within the assumptions of the accident analysis. During the reload core safety evaluation, the MTC is analyzed to determine that its values remain within the bounds of the original accident analysis during operation.

Assumptions made in safety analyses require that the MTC be less positive than a given upper bound and more positive than a given lower bound. The MTC is most positive at or near BOC; this upper bound must not be exceeded. This maximum upper limit occurs at or near BOC, all rods out (ARO), hot zero power conditions. For some core designs, the burnable absorbers may burn out faster than the fuel depletes early in the cycle. This may cause the boron concentration to increase with burnup early in the cycle and the most positive MTC not to occur at BOC, but somewhat later in the cycle. For these core designs, the predicted difference between the BOC MTC and the most positive MTC is used to adjust the BOC measured MTC to ensure that the MTC remains less than the limit during the entire cycle. At EOC the MTC takes on its most negative value, when the lower bound becomes important. This LCO exists to ensure that both the upper and lower bounds are not exceeded.

During operation, the condition of the upper LCO limit at BOC is ensured through measurement. The lower LCO limit at EOC is ensured either analytically or through measurement. The Surveillance checks at BOC and EOC on MTC provide confirmation that the MTC is behaving as anticipated so that the acceptance criteria are met.

The LCO establishes a maximum positive value that cannot be exceeded. The BOC positive limit and the EOC negative limit are established in the COLR to allow specifying limits for each particular cycle. This permits the unit to take advantage of improved fuel management and changes in unit operating schedule.

BASES

APPLICABILITY Technical Specifications place both LCO and SR values on MTC, based on the safety analysis assumptions described above.

In MODE 1, the limits on MTC must be maintained to ensure that any accident initiated from THERMAL POWER operation will not violate the design assumptions of the accident analysis. In MODE 2 with the reactor critical, the upper limit must also be maintained to ensure that startup and subcritical accidents (such as the uncontrolled control rod assembly or group withdrawal) will not violate the assumptions of the accident analysis. The lower MTC limit must be maintained in MODES 2 and 3, in addition to MODE 1, to ensure that cooldown accidents will not violate the assumptions of the accident analysis. In MODES 4, 5, and 6, this LCO is not applicable, since no Design Basis Accidents using the MTC as an analysis assumption are limiting when initiated from these MODES.

ACTIONSA.1

If the BOC MTC limit is violated, administrative withdrawal limits for control banks must be established to maintain the MTC within its limits. The MTC becomes more negative with control bank insertion and decreased boron concentration. A Completion Time of 24 hours provides enough time for evaluating the MTC measurement and computing the required bank withdrawal limits.

Using physics calculations, the time in cycle life at which the calculated MTC will meet the LCO requirement can be determined. At this point in core life Condition A no longer exists. The unit is no longer in the Required Action, so the administrative withdrawal limits are no longer in effect.

B.1

If the required administrative withdrawal limits at BOC are not established within 24 hours, the unit must be brought to MODE 2 with $k_{eff} < 1.0$ to prevent operation with an MTC that is more positive than that assumed in safety analyses.

The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

BASES

ACTIONS (continued)

C.1

Exceeding the EOC MTC limit means that the safety analysis assumptions for the EOC accidents that use a bounding negative MTC value may be invalid. If the EOC MTC limit is exceeded, the plant must be brought to a MODE or condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 4 within 12 hours.

The allowed Completion Time is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTSSR 3.1.3.1

This SR requires measurement of the MTC at BOC prior to entering MODE 1 in order to demonstrate compliance with the positive MTC SURVEILLANCE REQUIREMENTS (continued)

LCO. Meeting the limit prior to entering MODE 1 ensures that the limit will also be met at higher power levels.

The BOC MTC value for ARO will be inferred from isothermal temperature coefficient measurements obtained during the physics tests after refueling. If appropriate, the ARO value is adjusted to account for any increase in the MTC early in the cycle. The ARO value can then be directly compared to the BOC MTC limit of the LCO. If required, measurement results and predicted design values can be used to establish administrative withdrawal limits for control banks.

SR 3.1.3.2

In similar fashion, the LCO demands that the MTC be less negative than the specified value for EOC full power conditions. This measurement may be performed at any THERMAL POWER, but its results must be extrapolated to the conditions of RTP and all banks withdrawn in order to make a proper comparison with the LCO value. Because the RTP MTC value will gradually become more negative with further core depletion and boron concentration reduction, a 300 ppm SR value of MTC should necessarily be less negative than the EOC LCO limit. The 300 ppm SR value is sufficiently less negative than the EOC LCO limit value to ensure that the LCO limit will be met when the 300 ppm Surveillance criterion is met.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.3.2 is modified by three Notes that includes the following requirements:

- a. The SR must be performed within 7 effective full power days (EFPD) after reaching the equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm for the reasons discussed above. Measurement of the MTC may be suspended for the current operating cycle provided the benchmark criteria specified in DPC-NE-1007-PA, and the Revised MTC Prediction specified in the COLR are satisfied.
- b. If the 300 ppm Surveillance limit is exceeded, it is possible that the EOC limit on MTC could be reached before the planned EOC. Because the MTC changes slowly with core depletion, the Frequency of 14 EFPD is sufficient to avoid exceeding the EOC limit.
- c. The Surveillance limit for RTP boron concentration of 60 ppm is conservative. If the measured MTC at 60 ppm is more positive than the 60 ppm Surveillance limit, the EOC limit will not be exceeded because of the gradual manner in which MTC changes with core burnup.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 11.
2. UFSAR, Chapter 15.
3. UFSAR, Section 15.4.
4. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).
5. DPC-NE-1007-PA, "Conditional Exemption of the EOC MTC Measurement Methodology".