

## 1.1 SAFETY LIMIT

## 2.1 LIMITING SAFETY SYSTEM SETTING

### 1. APRM Flux Scram Trip Setting (Run Mode)

When the reactor mode switch is in the run position, the APRM flux scram setting shall be:

$$S < [.65W_D + 55]$$

with a maximum set point of 120% for core flow equal to  $98 \times 10^6$  lb/hr and greater.

where:

S = setting in per cent of rated power

$W_D$  = per cent of drive flow required to produce a rated core flow of 98 Mlb/hr.

In the event of operation with a maximum fraction of limiting power density (MFLPD) greater than the fraction of rated power (FRP), the setting shall be modified as follows:

$$S \leq (.65W_D + 55) \left[ \frac{FRP}{MFLPD} \right]$$

Where:

FRP = fraction of rated thermal power (2527 MWt)

MFLPD = maximum fraction of limiting power density where the limiting power density for each bundle is the design linear heat generation rate for that bundle.

The ratio of FRP/MFLPD shall be set equal to 1.0 unless the actual operating value is less than 1.0, in which case the actual operating value will be used.

This adjustment may also be performed by increasing the APRM gain by the inverse ratio, MFLPD/FRP, which accomplishes the same degree of protection as reducing the trip setting by FRP/MFLPD.

### 2. APRM Flux Scram Trip Setting (Refuel or Startup and Hot Standby Mode)

When the reactor mode switch is in the refuel or startup/hot standby position, the APRM scram shall be set at least then or equal to 15% of rated neutron flux.

## 1.1 SAFETY LIMIT

### B. Core Thermal Power Limit (Reactor Pressure $\leq$ 800 psig)

When the reactor pressure is  $\leq$  800 psig or core flow is less than 10% of rated, the core thermal power shall not exceed 25 percent of rated thermal power.

### C. Power Transient

1. The neutron flux shall not exceed the scram setting established in Specification 2.1.A for longer than 1.5 seconds as indicated by the process computer.
2. When the process computer is out of service, this safety limit shall be assumed to be exceeded if the neutron flux exceeds the scram setting established by Specification 2.1.A and a control rod scram does not occur.

### D. Reactor Water Level (Shutdown Condition)

Whenever the reactor is in the shutdown condition with irradiated fuel in the reactor vessel, the water level shall not be less than that corresponding to 12 inches above the top of the active fuel\* when it is seated in the core.

\*Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

## 2.1 LIMITING SAFETY SYSTEM SETTING

### 3. IRM Flux Scram Trip Setting

The IRM flux scram setting shall be set at less than or equal to 120/125 of full scale.

### B. APRM Rod Block Setting

The APRM rod block setting shall be:

$$S \leq [.65W_D + 43]$$

The definitions used above for the APRM scram trip apply.

In the event of operation with a maximum fraction limiting power density (MFLPD) greater than the fraction of rated power (FRP), the setting shall be modified as follows:

$$S \leq (.65W_D + 43) \left\{ \frac{FRP}{MFLPD} \right\}$$

The definitions used above for the APRM scram trip apply.

The ratio of FRP to MFLPD shall be set equal to 1.0 unless the actual operating value is less than 1.0, in which case the actual operating value will be used. This adjustment may also be performed by increasing the APRM gain by the inverse ratio, MFLPD/FRP, which accomplishes the same degree of protection as reducing the trip setting by FRP/MFLPD.

## 1.1 Safety Limit Bases

### FUEL CLADDING INTEGRITY

The fuel cladding integrity limit is set such that no calculated fuel damage would occur as a result of an abnormal operational transient. Because fuel damage is not directly observable, a step-back approach is used to establish a Safety Limit such that the minimum critical power ratio (MCPR) is no less than the MCPR fuel cladding integrity safety limit. MCPR > the MCPR fuel cladding integrity safety limit represents a conservative margin relative to the conditions required to maintain fuel cladding integrity.

The fuel cladding is one of the physical barriers which separate radioactive materials from the environs. The integrity of this cladding barrier is related to its relative freedom from perforations or cracking. Although some corrosion or use related cracking may occur during the life of the cladding, fission product migration from this source is incrementally cumulative and continuously measurable. Fuel cladding perforations, however, can result from thermal stresses which occur from reactor operation significantly above design conditions and the protection system safety settings. While fission product migration from cladding perforation is just as measurable as that from use related cracking, the thermally caused cladding perforations signal a

threshold, beyond which still greater thermal stresses may cause gross rather than incremental cladding deterioration. Therefore, the fuel cladding Safety Limit is defined with margin to the conditions which would produce onset of transition boiling, (MCPR of 1.0). These conditions represent a significant departure from the condition intended by design for planned operation. Therefore, the MCPR fuel cladding integrity safety limit is established such that no calculated fuel damage is expected to occur as a result of an abnormal operational transient. Basis of the values derived for this safety limit for each fuel type is documented in Reference 1.

- A. Reactor Pressure > 800 psig and  
Core Flow > 10% of Rated.

Onset of transition boiling results in a decrease in heat transfer from the clad and, therefore, elevated clad temperature and the possibility of clad failure. However, the existence of critical power, or boiling transition, is not a directly observable parameter in an operating reactor. Therefore, the margin to boiling transition is calculated from plant operating parameters such as core power, core flow, feedwater temperature, and core power distribution. The margin for each fuel assembly is characterized by the critical power ratio (CPR) which is the ratio of the bundle power which would produce onset of transition

## Safety Limit Bases (cont'd)

### B. Core Thermal Power Limit (Reactor Pressure < 800 psia)

At pressures below 800 psia, the core elevation pressure drop (0 power, 0 flow) is greater than 4.56 psi. At low powers and flows this pressure differential is maintained in the bypass region of the core. Since the pressure drop in the bypass region is essentially all elevation head, the core pressure drop at low powers and flows will always be greater than 4.56 psi. Analyses show that with a flow of  $28 \times 10^3$  lbs/hr. bundle flow, bundle pressure drop is nearly independent of bundle power and has a value of 3.5 psi. Thus, the bundle flow with a 4.56 psi driving head will be greater than  $28 \times 10^3$  lbs/hr. Full scale ATLAS test data taken at pressures from 14.7 psia to 800 psia indicate that the fuel assembly critical power at this flow is approximately 3.35 Mwt. At 25% of rated thermal power, the peak powered bundle would have to be operating at 3.84 times the average powered bundle in order to achieve this bundle power. Thus, a core thermal power limit of 25% for reactor pressures below 800 psia is conservative.

### C. Power Transient

During transient operation the heat flux (thermal power-to-water) would lag behind the neutron flux due to the inherent heat transfer time constant of the fuel which is 8-9 seconds. Also, the limiting safety system scram settings are at values

which will not allow the reactor to be operated above the safety limit during normal operation or during other plant operating situations which have been analyzed in detail. In addition, control rod scrams are such that for normal operating transients the neutron flux transient is terminated before a significant increase in surface heat flux occurs.

Control rod scram times are checked as required by Specification 4.3.C. Exceed-

ing a neutron flux scram setting and a failure of the control rods to reduce flux to less than the scram setting within 1.5 seconds does not necessarily imply that fuel is damaged; however, for this specification a safety limit violation will be assumed any time a neutron flux scram setting is exceeded for longer than 1.5 seconds.

If the scram occurs such that the neutron flux dwell time above the limiting safety system setting is less than 1.7 seconds, the safety limit will not be exceeded for normal turbine or generator trips, which are the most severe normal operating transients expected. These analyses show that even if the bypass system fails to operate, the design limit of MCPR = the MCPR fuel cladding integrity safety limit is not exceeded. Thus, use of a 1.5 second limit provides additional margin.

Neutron Flux Trip Settings1. APRM Flux Scram Trip Setting  
(Run Mode) (cont'd)

An increase in the APRM scram trip setting would decrease the margin present before the fuel cladding integrity Safety Limit is reached. The APRM scram trip setting was determined by an analysis of margins required to provide a reasonable range for maneuvering during operation. Reducing this operating margin would increase the frequency of spurious scrams which have an adverse effect on reactor safety because of the resulting thermal stresses. Thus, the APRM scram trip setting was selected because it provides adequate margin for the fuel cladding integrity Safety Limit yet allows operating margin that reduces the possibility of unnecessary scrams.

The scram trip setting must be adjusted to ensure that the LHGR transient peak is not increased for any combination of

maximum Fraction of Limiting Power Density (MFLPD) and reactor core thermal power. The scram setting is adjusted in accordance with the formula in Specification 2.1.A.1, when the MFLPD is greater than the Fraction of Rated Power (FRP). The adjustment may be accomplished by increasing the APRM gain by the reciprocal of FRP/MFLPD. This provides the same degree of protection as reducing the trip setting by FRP/MFLPD by raising the initial APRM reading closer to the trip setting such that a scram would be received at the same point in a transient as if the trip setting had been reduced by FRP/MFLPD.

2. APRM Flux Scram Trip Setting  
(Refuel or Start & Hot Standby Mode)

For operation in the startup mode while the reactor is at low pressure, the APRM scram setting of 15 percent of rated power provides adequate thermal margin between the setpoint and the safety limit, 25 percent of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, tempera-

ture coefficients are small, and control rod patterns are constrained to be uniform by operating procedures backed up by the rod worth minimizer. Of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because the flux distribution associated with uniform rod withdrawals does not involve high local peaks, and because several rods must be moved to change power by a significant percentage of rated power, the rate of power rise is very slow. Generally, the heat flux is in near equilibrium with the fission rate. In an assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than 5 percent of rated power per minute, and the APRM system would be more than adequate to assure a scram before the power could exceed the safety limit. 15 percent APRM scram remains active until the mode switch is placed in the RUN position. This switch occurs when reactor pressure is greater than 850 psig.

3. IRM Flux Scram Trip Setting

The IRM system consists of 8 chambers, 4 in each of the reactor protection system logic channels. The IRM is a 5-decade instrument which covers the range of power level between that covered by the SRM and the APRM. The 5 decades are broken down into 10 ranges, each being one-half of a decade in size.

## 2.1.A. Neutron Flux Trip Setting

### 3. IRM Flux Scram Trip Setting (cont'd)

The IRM scram trip setting of 120 divisions is active in each range of the IRM. For example, if the instrument were on range 1, the scram setting would be a 120 divisions for that range; likewise, if the instrument were on range 5, the scram would be 120 divisions on that range. Thus, as the IRM is ranged up to accommodate the increase in power level, the scram trip setting is also ranged up.

The most significant sources of reactivity change during the power increase are due to control rod withdrawal. In order to ensure that the IRM provided adequate protection against the single rod withdrawal error, a range of rod withdrawal accidents was analyzed. This analysis included starting the accident at various power levels. The most severe case involves an initial condition in which the reactor is just subcritical and the IRM system is not yet on scale.

Additional conservatism was taken in this analysis by assuming that the IRM channel closest to the withdrawn rod is bypassed. The results of this analysis show that the reactor is scrammed and peak power limited to one percent of rated power, thus maintaining MCPR above the MCPR fuel cladding integrity safety limit. Based on the above analysis, the IRM provides protection against local control rod withdrawal errors and continuous withdrawal of control rods in sequence and provides backup protection for the APRM.

### 2.1.B

### APRM Rod Block Trip Setting

Reactor power level may be varied by moving control rods or by varying the recirculation flow rate. The APRM system provides a control rod block to prevent gross rod withdrawal at constant recirculation flow rate to protect against grossly exceeding the MCPR fuel cladding integrity safety limit. This rod block trip setting, which is automatically varied with recirculation loop flow rate, prevents an increase in the reactor power level to excessive values due to control rod withdrawal. The flow variable trip setting provides substantial margin from fuel damage, assuming a steady-state operation at the trip setting, over the entire recirculation flow range. The margin to the Safety Limit increases as the flow decreases for the specified trip setting versus flow relationship; therefore the worst case MCPR which could occur during steady-state operation is at 100% of rated thermal power because of the APRM rod block trip setting. The actual power distribution in the core is established by specified control rod sequences and is monitored continuously by the in-core LPRM system. As with the APRM scram trip setting, the APRM rod block trip setting is adjusted downward if the maximum fraction of limiting power density exceeds the fraction of rated power, thus preserving the APRM rod block safety margin.

Bases:

- 1.2. The reactor coolant system integrity is an important barrier in the prevention of uncontrolled release of fission products. It is essential that the integrity of this system be protected by establishing a pressure limit to be observed for all operating conditions and whenever there is irradiated fuel in the reactor vessel.

The pressure safety limit of 1325 psig as measured by the vessel steam space pressure indicator is equivalent to 1375 psig at the lowest elevation of the reactor coolant system. The 1375 psig value is derived from the design pressures of the reactor pressure vessel, coolant system piping and isolation condenser. The respective design pressures are 1250 psig at 575°F, 1175 psig at 560°F, and 1250 psig at 575°F. The pressure safety limit was chosen as the lower of the pressure transients permitted by the applicable design codes: ASME Boiler and Pressure Vessel Code, Section III for the pressure vessel and isolation condenser and USASI B31.1 Code for the reactor coolant system piping. The ASME Boiler and Pressure Vessel Code permits pressure transients up to 10% over design pressure (110% X 1250 = 1375 psig), and the USASI Code permits pressure transients up to 20% over the design pressure (120% X 1175 = 1410 psig). The Safety Limit pressure of 1375 psig is referenced to the lowest elevation of the primary coolant system.

Evaluation methodology used to assure that this safety limit pressure is not exceeded for any reload is documented in Reference 1. The design basis for the reactor pressure vessel makes evident the substantial margin of protection against failure at the safety pressure limit of 1375 psig. The vessel has been designed for a general membrane stress no greater than 26,700 psi at an internal pressure of 1250 psig; this is a factor of 1.5 below the yield strength of 40,100 psi at 575°F. At the pressure limit of 1375 psig, the general membrane stress will only be 29,400 psi, still safely below the yield strength.

The relationships of stress levels to yield strength are comparable for the isolation condenser and primary system piping and provide a similar margin of protection at the established safety pressure limit.

The normal operating pressure of the reactor coolant system is 1000 psig. For the turbine trip or loss of electrical load transients, the turbine trip scram or generator load rejection scram, together with the turbine bypass system, limit the pressure to approximately 1100 psig (4). In addition, pressure relief valves have been provided to reduce the probability of the safety valves, which discharged to the drywell, operating in the event that the turbine bypass should fail.

Finally, the safety valves are sized to keep the reactor coolant system pressure below 1375 psig with no credit taken for the relief valves during the postulated full closure of all MSIV's without direct (valve position switch) scram. Credit is taken for the neutron flux scram, however.

The indirect flux scram and safety valve actuation provide adequate margin below the peak allowable vessel pressure of 1375 psig.

Reactor pressure is continuously monitored in the control room during operation on a 1500 psi full scale pressure recorder.

- (4) SAR, Section 11.2.2. -  
also: "Dresden 3 Second Reload License  
Submittal," 9/14/73  
also: "Dresden Station Special Report  
No. 29 Supplement B." 20

Bases:

2.2 In compliance with Section III of the ASME Code, the safety valves must be set to open at no higher than 103% of design pressure, and they must limit the reactor pressure to no more than 110% of design pressure. Both the neutron flux scram and safety valve actuation are required to prevent overpressurizing the reactor pressure vessel and thus exceeding the pressure safety limit. The pressure scram is available as a backup protection to the high flux scram.

If the high flux scram were to fail, a high pressure scram would occur at 1060 psig. Analyses are performed as described in the Generic Reload Fuel Application, NEDE-24011-P-A (Approved revision number at time reload analyses are performed) for each reload to assure that the pressure safety limit is not exceeded.

The control rod drive scram system is designed so that all of the water which is discharged from the reactor by a scram can be accommodated in the discharge piping. A part of this piping is an instrument volume (u-tube in the piping) which accommodates in excess of 50 gallons of water and is the low point in the piping. No credit was taken for this volume in the design of the discharge piping as concerns the amount of water which must be accommodated during a scram. During normal operation the discharge volume is empty; however, should it fill with water, the water discharged to the piping from the reactor could not be accommodated which would result in slow scram times or partial or no control rod insertion. To preclude this occurrence, level switches have been provided in the instrument volume which alarm and scram the reactor when the volume of water reaches 50 gallons. As indicated above, there is sufficient volume in the piping to accommodate the scram without impairment of the scram times or amount of insertion of the control rods. This function shuts the reactor down while sufficient volume remains to accommodate the discharged water and precludes the situation in which a scram would be required but not be able to perform its function adequately.

Loss of condenser vacuum occurs when the condenser can no longer handle the heat input. Loss of condenser vacuum initiates a closure of the turbine stop valves and turbine bypass valves which eliminates the heat input to the condenser. Closure of the turbine stop and bypass valves causes a pressure transient, neutron flux rise, and an increase in surface heat flux. To prevent the clad safety limit from being exceeded if this occurs, a reactor scram occurs on turbine stop valve closure. The turbine stop valve closure scram function alone is adequate to prevent the clad safety limit from being exceeded in the event of a turbine trip transient with bypass closure. The condenser low vacuum scram is a back-up to the

stop valve closure scram and causes a scram before the stop valves are closed and thus the resulting transient is less severe. Scram occurs at 23" Hg vacuum, stop valve closure occurs at 20" Hg vacuum and bypass closure at 7" Hg vacuum.

High radiation levels in the main steamline tunnel above that due to the normal nitrogen and oxygen radioactivity is an indication of leaking fuel. A scram is initiated whenever such radiation level exceeds ~~three~~ times normal background. The purpose of this scram is to reduce the source of such radiation to the extent necessary to prevent excessive turbine contamination. Discharge of excessive amounts of radioactivity to the site environs is prevented by the air ejector off-gas monitors which cause an isolation of the main condenser off-gas line provided the limit specified in Specification 3.8 is exceeded.

The main steamline isolation valve closure scram is set to scram when the isolation valves are 10% closed from full open. This scram anticipates the pressure and flux transient, which would occur when the valves close. By scrambling at this setting the resultant transient is insignificant.

A reactor mode switch is provided which actuates or bypasses the various scram functions appropriate to the particular plant operating status. Ref. Section 7.7.1.2 SAR.

The manual scram function is active in all modes, thus providing for a manual means of rapidly inserting control rods during all modes of reactor operation.

The IRM system provides protection against excessive power levels and short reactor periods in the start-up and intermediate power ranges. Ref.

Bases:

3.2 In addition to reactor protection instrumentation which initiates a reactor scram, protective instrumentation has been provided which initiates action to mitigate the consequences of accidents which are beyond the operators ability to control, or terminates operator errors before they result in serious consequences. This set of Specifications provides the limiting conditions of operation for the primary system isolation function, initiation of the emergency core cooling system, control rod block and standby gas treatment systems. The objectives of the specifications are (i) to assure the effectiveness of the protective instrumentation when required by preserving its capability to tolerate a single failure of any component of such systems even during periods when portions of such systems are out of service for maintenance, and (ii) to prescribe the trip settings required to assure adequate performance. When necessary, one channel may be made inoperable for brief intervals to conduct required functional tests and calibrations.

Some of the settings on the instrumentation that initiates or controls core and containment cooling have tolerances explicitly stated where the high and low values are both critical and may have a substantial effect on safety. It should be noted that the setpoints of other instrumentation, where only the high or low end of the setting has a direct bearing on safety, are chosen at a level away from the normal operating range to prevent inadvertent actuation of the safety system involved and exposure to abnormal situations.

Isolation valves are installed in those lines that penetrate the primary containment and must be isolated during a loss of coolant accident so that the radiation dose limits are not exceeded during an accident condition. Actuation of these valves is initiated by protective instrumentation shown in

Table 3.2.1 which senses the conditions for which isolation is required. Such instrumentation must be available whenever primary containment integrity is required. The objective is to isolate the primary containment so that the guidelines of 10 CFR 100 are not exceeded during an accident.

The instrumentation which initiates primary system isolation is connected in a dual bus arrangement. Thus, the discussion given in the bases for Specification 3.1 is applicable here.

The low-reactor water level instrumentation is set to trip at >8 inches on the level instrument (top of active fuel is defined to be 360 inches above vessel zero) and after allowing for the full power pressure drop across the steam dryer the low level trip is at 504 inches above vessel zero, or 144 inches above the top of active fuel. Retrofit 8x8 fuel has an active fuel length 1.24 inches longer than earlier fuel designs. However, present trip setpoints were used in the LOCA analyses (NEDO-24146A, April 1979). This trip initiates closure of Group 2 and 3 primary containment isolation valves but does not trip the recirculation pumps (reference SAR Section 7.7.2). For a trip setting of 504 inches above vessel zero (144 inches above top of active fuel) and a 60-second valve closure time, the valves will be closed before perforation of the cladding occurs even for the maximum break; the setting is therefore adequate.

The low low reactor level instrumentation is set to trip when reactor water level is 444 inches above vessel zero (with top of active fuel defined as 360 inches above vessel zero, -59 inches is 84 inches above the top of active fuel).

This trip initiates closure of Group 1 primary containment isolation valves, Ref. Section 7.7.2.2 SAR, and also activates the ECC subsystems, starts the emergency diesel generator and trips the recirculation pumps. This trip setting level was chosen to be high enough to prevent spurious operation but low enough to initiate ECCS operation and primary system isolation so that no melting of the fuel cladding will occur and so that post accident cooling can be accomplished and the guidelines of 10 CFR 100 will not be violated. For the complete circumferential break of a 28-inch recirculation line and with the trip setting given above, ECCS initiation and primary system isolation are initiated in time to meet the above criteria.

Two sensors on the isolation condenser supply and return lines are provided to detect the failure of isolation condenser line and actuate isolation action. The sensors on the supply and return sides are arranged in a 1 out of 2 logic and, to meet the single failure criteria, all sensors and instrumentation are required to be operable. The trip settings of 20 psig and 32" of water and valve closure time are such as to prevent uncovering the core or exceeding site limits. The sensors will actuate due to high flow in either direction.

The HPCI high flow and temperature instrumentation are provided to detect a break in the HPCI piping. Tripping of this instrumentation results in actuation of HPCI isolation valves, i.e., Group 4 valves. Tripping logic for this function is the same as that for the isolation condenser and thus all sensors are required to be operable to meet the single failure criteria. The trip settings of 200°F and 300% of design flow and valve closure time are such that core uncover is prevented and fission product release is within limits.

The instrumentation which initiates ECCS action is arranged in a dual bus system. As for other vital instrumentation arranged in this fashion the Specification preserves the effectiveness of the system even during periods when maintenance or testing is being performed.

The control rod block functions are provided to prevent excessive control rod withdrawal so that MCPR does not go below the MCPR fuel cladding integrity safety limit. The trip logic for this function is 1 out of n; e.g., any trip on one of the six APRM's, 8 IRM's, or 4 SRM's will result in a rod block. The minimum instrument channel requirements assure sufficient instrumentation to assure the single failure criteria are met. The minimum instrument channel requirements for the RBM

may be reduced by one for a short period of time to allow for maintenance, testing, of calibration. This time period is only ~3% of the operating time in a month and does not significantly increase the risk of preventing an inadvertent control rod withdrawal.

The APRM rod block function is flow biased and prevents a significant reduction in MCPR especially during operation at reduced flow. The APRM provides gross core protection; i.e., limits the gross withdrawal of control rods in the normal withdrawal sequence.

In the refuel and startup/hot standby modes, the APRM rod block function is set at 12% of rated power. This control rod block provides the same type of protection in the Refuel and Startup/Hot Standby mode as the APRM flow biased rod block does in the run mode; i.e.,

prevents control rod withdrawal before a scram is reached.

The RBM rod block function provides local protection of the core, i.e., the prevention of transition boiling in a local region of the core, for a single rod withdrawal error from a limiting control rod pattern. The trip point is flow biased. The worst case single control rod withdrawal error is analyzed for each reload to assure that with the specific trip settings, rod withdrawal is blocked before the MCPR reaches the MCPR fuel cladding integrity safety limit.

Below 30 percent power, the worst case withdrawal of a single control rod without rod block action will not violate the MCPR fuel cladding integrity safety limit. Thus, the RBM rod block function is not required below this power level.

indicative of a generic control rod drive problem and the reactor will be shutdown.

Also if damage within the control rod drive mechanism and in particular, cracks in drive internal housings, cannot be ruled out, then a generic problem affecting a number of drives cannot be ruled out. Circumferential cracks resulting from stress assisted intergranular corrosion have occurred in the collet housing of drives at several BWRs. This type of cracking could occur in a number of drives and if the cracks propagated until severance of the collet housing occurred, scram could be prevented in the affected rods. Limiting the period of operation with a potentially severed collet housing and requiring increased surveillance after detecting one stuck rod will assure that the reactor will not be operated with a large number of rods with failed collet housings.

## E. Control Rod Withdrawal

1. Control rod dropout accidents as discussed in Reference 6 can lead to significant core damage. If coupling integrity is maintained, the possibility of a rod dropout accident is eliminated. The overtravel position feature provides a positive check as only uncoupled drives may reach this position. Neutron instrumentation response to rod movement provides a verification that the rod is following its drive. Absence of such response to drive movement would provide cause for suspecting a rod to be uncoupled and stuck. Restricting recoupling verifications to power levels above 20% provides assurance that a rod drop during a recoupling verification would not result in a rod drop accident.

2. The control rod housing support restricts the outward movement of a control rod to less than 3 inches in the extremely remote event of a housing failure. The amount of reactivity which could be added by this

small amount of rod withdrawal, which is less than a normal single withdrawal increment, will not contribute to any damage to the primary coolant system. The design basis is given in Section 6.6.1 of the SAR, and the design evaluation is given in Section 6.6.3. This support is not required if the reactor coolant system is at atmospheric pressure since there would then be no driving force to rapidly eject a drive housing. Additionally, the support is not required if all control rods are fully inserted and if an adequate shutdown margin with one control rod withdrawn has been demonstrated since the reactor would remain subcritical even in the event of complete ejection of the strongest control rod.

3. Control rod withdrawal and insertion sequences are established to assure that the maximum insequence individual control rod or control rod segments which are withdrawn could not be worth enough to cause the rod drop accident design limit of 280 cal/gam to be exceeded

if they were to drop out of the core in the manner defined for the Rod Drop Accident.<sup>(5)</sup> These sequences are developed prior to initial operation of the unit following any refueling outage and the requirement that an operator follow these sequences is backed up by the operation of the RSM or a second qualified station employee. These sequences are developed to limit reactivity worths of control rods and together with the integral rod velocity limiters and the action of the control rod drive system, limit potential reactivity insertion such that the results of a control rod drop accident will not exceed a maximum fuel energy content of 280 cal/gm. The peak fuel enthalpy of 280 cal/gm is below the energy content at which rapid fuel dispersal and primary system damage have been found to occur based on experimental data as is discussed in Reference 1.

The analysis of the control rod drop accident was originally presented in Sections 7.9.3, 14.2.1.2 and 14.2.1.4 of the Safety Analysis Report. Improvements in analytical capability have allowed a more refined analysis of the control rod drop accident

## Bases (cont'd)

These techniques are described in a topical report (1) and two supplements. (2) (3) In addition, a banked position withdrawal sequence described in Reference (4) has been developed to further reduce incremental rod worths.

By using the analytical models described in those reports coupled with conservative or worst-case input parameters, it has been determined that for power levels less than 20% of rated power, the specified limit (typically 1.3%  $\Delta K$ ) on insequence control rod or control rod segment worths will limit the peak fuel enthalpy to less than 280 cal/gm. Above 20% power even single operator errors cannot result in out-of-sequence control rod worths which are sufficient to reach a peak fuel enthalpy of 280 cal/gm should a postulated control rod drop accident occur.

(1) Paone, C.J., Stirn, R.C. and Wooley, J.A., "Rod Drop Accident Analysis for Large Boiling Water Reactors", NEDO-10527, March 1972.

(2) Stirn, R.C., Paone, C.J., and Young, R.M., "Rod Drop Accident Analysis for Large BWR's", Supplement 1 - NEDO-10527, July 1972

(3) Stirn, R.C., Paone, C.J., and Haun, J.H., "Rod Drop Accident Analysis for Large BWR's Addendum No. 2, Exposed Cores", Supplement 2-NEDO 10527, January 1973.

The following parameters and worst-case bounding assumptions have been utilized in the reload analysis to determine compliance with the 280 cal/gm peak fuel enthalpy. Method and basis for the rod drop accident analyses are documented in Reference 6. Each core reload will be analyzed to show conformance to the limiting parameters.

- a. An inter-assembly local power peaking factor (5)
- b. The delayed neutron fraction chosen for the bounding reactivity curve.
- c. A beginning-of-life Doppler reactivity feedback.
- d. Scram times slower than the technical Specification rod scram insertion rate (Section 3.3.C.1)
- e. The maximum possible rod drop velocity (3.11 ft./sec.)
- f. The design accident and scram reactivity shape function.
- g. The minimum moderator temperature to reach criticality.

(4) C.J. Paone, "Banked Position Withdrawal Sequence" Licensing Topical Report NEDO-2123, January 1977.

(5) To include the power spike effect caused by gaps between fuel pellets.

(6) Generic Reload Fuel Application NEDE-24011-P-A \*

\*Approved revision number at time reload fuel analyses are performed.

operator with a visual indication of neutron level. This is needed for knowledgeable and efficient reactor startup at low neutron level. The consequences of reactivity accidents are functions of the initial neutron flux. The requirement of at least 3 counts per second assures that any transient, should it occur, begins at or above the initial value of  $10^{-8}$  of rated power used in the analyses of transients from cold conditions. One operable SRM channel would be adequate to monitor the approach to criticality using homogeneous patterns of scattered control rod withdrawal. A minimum of two operable SRM's are provided as an added conservatism.

5. The Rod Block Monitor (RBM) is designed to automatically prevent fuel damage in the event of erroneous rod withdrawal from locations of high power density during high power level operation. Two channels are provided and one of these may be bypassed from the console for maintenance and/or testing. Tripping of one of the channels will block erroneous rod withdrawal soon enough to prevent fuel damage. This system backs up the operator who withdraws rods according to a written sequence. 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. Amendments 17/18 and 19/20 present the results of an evaluation of a rod block monitor failure. These amendments show that during reactor operation with certain limiting control rod patterns, the withdrawal of a designated single control rod could result in one or more fuel rods with MCPRs less than the MCPR fuel cladding integrity safety limit. 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 Nuclear 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

### C. Scram Insertion Times

The control rod system is analyzed 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 MCPR fuel cladding integrity safety limit. Analysis of the limiting power transient shows that the negative reactivity rates resulting from the scram with the average response of all the drives as given in the above specification, provide the required protection, and MCPR remains greater than the MCPR fuel cladding integrity safety limit.

The minimum amount of reactivity to be inserted during a scram is controlled by permitting no more than 10% of the operable rods to have long scram times. In the analytical treatment of the transients, 300 milliseconds are allowed between a neutron sensor reaching the scram point and the start of motion of the control rods. This is adequate and conservative when compared to the typically observed time delay of about 270 milliseconds. Approximately 70 milliseconds after neutron flux reaches the