

TECHNICAL SPECIFICATION CHANGE REQUEST NO. 88, APPENDIX A

Replace page 3/4 1-34 of Appendix A to Operating License No. DPR-72 with page 3/4 1-34, attached.

Proposed Change

Reflect the interchange of safety rod groups 1 and 2 in Figure 3.1-7. All rod locations currently (i.e., Cycle 3) identified as group 1 should be changed to group 2 and vice versa.

Reason for Proposed Change

In response to recommendations from our NSSS vendor, Florida Power Corporation intends to administratively maintain some trippable negative reactivity during certain modes of operation (e.g., prolonged hot standby). This will be achieved by withdrawing safety group 1 rods during such modes. However, a $\geq 1\% \Delta k/k$ shutdown margin (SDM) must be maintained with all-rods-in (ARI) and the maximum ejected rod worth stuck out. Therefore, by withdrawing group 1 rods, additional chemical shim (boration) must be added to the reactor coolant system to achieve the SDM requirements. This chemical shim increases waste generation and should be minimized. To minimize the shim, the worth of the withdrawn group rods should also be minimized. The rod group designated safety group 2 in Cycle 3 has less worth than that designated group 1, so an interchange was made.

Safety Analysis of Proposed Change

The redesignation of two (2) safety control rod groups has no impact on plant safety. All safety groups (1-4) are fully withdrawn during operation in Modes 1 and 2 when $k_{eff} \geq 1.0$ (see also LIMITING CONDITIONS FOR OPERATION 3.1.3.5) and insert into the core upon receiving appropriate Reactor Protection System inputs. They, therefore, serve their safety function (negative reactivity insertion during transient conditions) without regard to group designation. Having one group withdrawn while in certain modes of operation is not required by technical specification or safety analyses but provides a means for rapid negative reactivity insertion, should it be needed, as compared to boration from available sources. This approach is, therefore, more conservative than required by the technical specifications.