



Sequoyah Nuclear Plant Unit 2 TS 4.2.2 “Control Rod Assemblies” Exigent LAR

Pre-Submittal Conference Call

April 16, 2020

Objectives

- Provide a description of the SQN Unit 2 H-08 Control Rod issue
- Provide overview of planned implementation actions
- Provide overview of expected License Amendment Request (LAR) content
- Discuss planned submittal date and need date
- Answer NRC questions

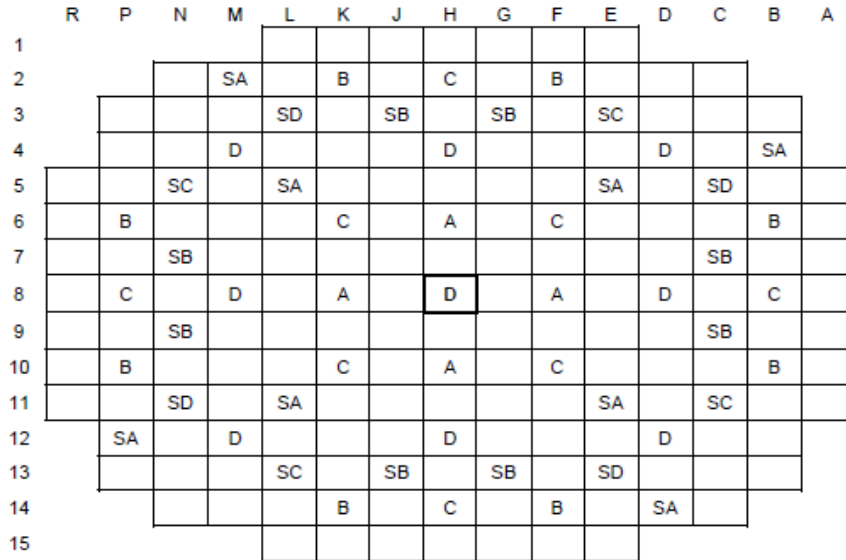
Background

- Sequoyah Units 1 & 2 are Westinghouse 4-loop 3455MWt ice condenser plant designs
 - Framatome HTP 17x17 fuel
 - 193 Fuel assemblies, 53 control rods
- Unit 2 is currently shut down for the U2R23 refueling outage

Background - H-08

- During U2R23, excessive wear was identified on the faces of the stationary grippers along with wear marks along the interior walls of the control rod drive mechanism.
- The wear is similar to the wear identified on Unit 1 during U1R23 in November 2019.
- Unit 2 has not experienced the same dropped rod events as Unit 1.

Background - Control Rod Configuration



Control Bank	Number of Rods	Shutdown Bank	Number of Rods
A	4	SA	8
B	8	SB	8
C	8	SC	4
D	9	SD	4

- Total of 53 Rod Control Cluster Assemblies (RCCA)
- RCCAs are grouped into Banks:
 - Four Shutdown Banks
 - Four Control banks
- Rod H-08 is part of Control Bank D and located in the center of the core

Background - H-08 Repairs

- Replacement of the Control Rod Drive Mechanism (CRDM) grippers is a long lead activity with first-of-a-kind elements (custom tooling, processes, crew qual. on mockups, etc.)
- Temporary modifications to utilize the H-08 movable gripper to hold the rod withdrawn were investigated during U1R23 but were not viable.
- Design change package being prepared for physical removal of the H-08 rod for the upcoming cycle.

Plant Changes Required

- Remove RCCA and associated drive shaft at core location H-08
- Install control rod guide tube flow restrictor on the upper internals
- Remove H-08 inputs to Rod Position Indication (RPI) system
- Remove power fuses for H-08 CRDM from the Rod Control system
- Revise Reload Safety Evaluation to include impact of control rod removal on nuclear design and safety analyses
- Revise affected procedures and design documents

Planned LAR Content

- Evaluated Rod H-08 removal impacts on:
 - Shutdown Margin
 - Boron Concentration and Boron Worth
 - Moderator Temperature Coefficient
- UFSAR Chapter 15 parameters were analyzed using the NRC-approved methods described in TS 5.6.3 and showed that limits assumed in safety analysis remain bounding.
- The Reload Safety Evaluation for the removal of H-08 validated all cycle-specific Reload Design Safety Analysis Review Checklist limits.

Overview of Proposed Change

- Requesting proposed amendment to allow Unit 2 to operate with 52 full-length control rod assemblies for one cycle
- No methodology changes
- Proposed change to TS 4.2.2 (change bar on right):

4.2.2 Control Rod Assemblies

-----NOTE-----

Operation with 52 full length control rod assemblies (with no control rod assembly installed in core location H-08) is permitted during Cycle 24.

The reactor core shall contain 53 full length and no part length control rod assemblies. The full length control rod assemblies shall contain a nominal 142 inches of absorber material. The nominal values of absorber material shall be 80 percent silver, 15 percent indium, and 5 percent cadmium. All control rods shall be clad with stainless steel tubing.

Planned LAR Content

- Current COLR limits remain unchanged.
- No new operator actions are expected.
- No impact on the functionality, structural integrity, or thermal hydraulic configuration of the reactor vessel upper internals
 - Flow restrictor installed in place of the control rod drive shaft

Precedence LARs

- TVA (Sequoyah Unit 1) – Exigent LAR to Revise TS 4.2.2 “Control Rod Assemblies” (LAR – 11/16/19, SE 11/21/19)
- Duke (McGuire) – Exigent LAR to Revise TS 4.2.2 “Control Rod Assemblies” (LAR – 9/7/18, Withdrawn 9/28/18)
 - LAR was to remove Rod H-08 from the core.
 - LAR was submitted as a contingency if a repair to a thermal sleeve could not be performed. Repairs were successful
- South Texas Project – Emergency LAR to Revise TS 5.3.2 to Allow Operation with 56 Full-Length Rod Assemblies for Unit 1 Cycle 20 (LAR -12/3/15, SE 12/11/15)

Proposed Schedule for Submittal and Requested Approval

- Sequoyah plans to submit the exigent LAR on April 17
- Plant is currently in Mode 6, progressing into Core Empty (No Mode) and continuing with refueling outage activities
- Plant will return to Mode 6 and remain in Mode 6 pending LAR approval and implementation of the design change
- Request NRC review 7 days after submittal

Closing and Questions