### Attachment 1

Proposed Revision to Technical Specifications
Flow Measurement Uncertainty

#### POWER DISTRIBUTION LIMITS

#### SURVEILLANCE REQUIREMENT (Continued)

- 4.2.3.1.5 The RCS total flow rate shall be determined by precision heat balance measurement at least once per 18 months. Within 7 days prior to performing the precision heat balance, the instrumentation used for determination of steam pressure, feedwater pressure, feedwater temperature, and feedwater venturi  $\triangle$  P in the calorimetric calculations shall be calibrated.
- 4.2.3.1.6 If the feedwater venturis are not inspected and cleaned at least once per 18 months, an additional 0.1% will be added to the total RCS flow measurement uncertainty.

POWER DISTRIBUTION LIMITS LIMITING CONDITION FOR OPERATION ACTION (Continued) Within 24 hours of initially being outside the above limits, verify, through incore flux mapping and RCS total flow rate that FN and RCS total flow rate are restored to within the above limits, or reduce THERMAL POWER to less than 5% of RATED THERMAL POWER within the next 2 hours. Identify and correct the cause of the out-of-limit condition prior to increasing THERMAL POWER above the reduced THERMAL POWER limit required by ACTION a.2. and/or b., above; subsequent POWER OPERATION may proceed provided that Fin and indicated RCS total flow rate are demonstrated, through incore flux mapping and RCS total flow rate comparison, to be within the region of acceptable operation prior to exceeding the following THERMAL POWER levels: A nominal 32% of RATED THERMAL POWER, and A nominal 50% of RATED THERMAL POWER. SURVEILLANCE REQUIREMENT (Continued) 4.2.3.2.1 The provisions of Specification 4.0.4 are not applicable. 4.2.3.2.2 RCS total flow rate and  $F_{\text{all}}^{\text{N}}$  shall be determined to be within the acceptable range at least once per 31 Effective Full Power Days. 4.2.3.2.3 The indicated RCS total flow rate shall be verified to be within the acceptable range at least once per 12 hours when the most recently obtained value of FAH, obtained per Specification 4.2.3.2.2, is assumed to exist. 4.2.3.2.4 The RCS total flow rate indicators shall be subjected to a CHANNEL CALIBRATION at least once per 18 months. The measurement instrumentation shall be calibrated within 7 days prior to the performance of the calorimetric flow measurement. 4.2.3.2.5 The RCS total flow rate shall be determined by precision heat balance measurement at least once per 18 months. Within 7 days prior to performing the precision heat balance, the instrumentation used for determination of steam pressure, feedwater pressure, feedwater temperature, and feedwater venturi AP in the calorimetric calculations shall be calibrated. 4.2.3.2.6 If the feedwater venturis are not inspected and cleaned at least once per 18 months, an additional 0.1% will be added to the total RCS flow measurement uncertainty. MILLSTONE - UNIT 3 3/4 2-19

# HEAT FLUX HOT CHANNEL FACTOR and RCS FLOW RATE AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (Continued)

When an  $F_Q$  measurement is taken, an allowance for both experimental error and manufacturing tolerance must be made. An allowance of 5% is appropriate for a full-core map taken with the Incore Detector Flux Mapping System, and a 3% allowance is appropriate for manufacturing tolerance.

The Radial Peaking Factor,  $F_{\chi\chi}(Z)$ , is measured periodically to provide assurance that the Hot Channel Factor,  $F_{\Omega}(Z)$ , remains within its

limit. The F limit for RATED THERMAL POWER ( $F_{Y}^{RTP}$ ) as provided in the Radial Peaking Factor Limit Report per Specification 6.9.1.6 was determined from expected power control manuevers over the full range of burnup conditions in the core.

When RCS flow rate and  $F_{AH}^{N}$  are measured, no additional allowances are necessary prior to comparison with the limits of the Limiting Condition for Operation. Measurement errors of 1.8% for four loop flow and 2.0% for three loop flow for RCS total flow rate and 4% for  $F_{AH}^{N}$  have been allowed for in determination of the design DNBR value.

The measurement error for RCS total flow rate is based upon performing a precision heat balance and using the result to calibrate the RCS flow rate indicators. Potential fouling of the feedwater venturi which might not be detected could bias the result from the precision heat balance in a nonconservative manner. Therefore, a penalty of 0.1% for undetected fouling of the feedwater venturi will be added if venturis are not inspected and cleaned at least once per 18 months. Any fouling which might bias the RCS flow rate measurement greater than 0.1% can be detected by monitoring and trending various plant performance parameters. If detected, action shall be taken before performing subsequent precision heat balance measurements, i.e., either the effect of the fouling shall be quantified and compensated for in the RCS flow rate measurement or the venturi shall be cleaned to eliminate the fouling.

The 12-hour periodic surveillance of indicated RCS flow is sufficient to detect only flow degradation which could lead to operation outside the acceptable region of operation defined in Specifications 3.2.3.1 and 3.2.3.2.

## 3/4.2.4 QUADRANT POWER TILT RATIO

The QUADRANT POWER TILT RATIO limit assures that the radial power distribution satisfies the design values used in the power capability analysis. Radial power distribution measurements are made during STARTUP testing and periodically during power operation.