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June 15, 2021 GO2-21-067

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397

**CYCLE 26 CORE OPERATING LIMITS REPORT** 

Dear Sir or Madam:

In accordance with Columbia Generating Station Technical Specification (TS) 5.6.3.d, Energy Northwest herewith submits the Cycle 26 Core Operating Limits Report (COLR). The operating limits in the COLR revision were developed in accordance with the requirements of TS 5.6.3.a, b, and c. The changes to the COLR have been reviewed by the Columbia Generating Station Plant Operations Committee.

No new regulatory commitments are made in this letter. If you have any questions or require additional information, please contact Mr. R. M. Garcia, Licensing Supervisor, at (509) 377-8463.

Executed on this  $\frac{15}{}$  day of  $\frac{\text{June}}{}$ , 2021.

Respectfully,

D. M. Wolfgramm

Manager, Regulatory Affairs

Enclosure – as stated

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cc: NRC Region IV Regional Admin

NRC Region IV PM

NRC Senior Resident Inspector C.D. Sonoda – BPA (w/o enc)

GO2-21-067 Enclosure

> Core Operating Limits Report Columbia Generating Station Cycle 26

> > March 2021

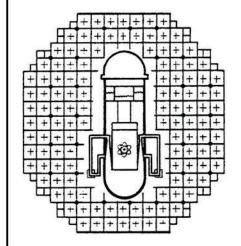
## **CORE OPERATING LIMITS REPORT**

## **COLUMBIA GENERATING STATION CYCLE 26**

## **Revision 26.0**

### **March 2021**







### **DESCRIPTION OF CHANGES**

#### **Justification**

The operating limits are established per Technical Specification (TS) 5.6.3a using NRC approved methodology listed in TS 5.6.3b. As required by TS 5.6.3c, the core operating limits are determined such that all applicable limits of the safety analysis are met. (EC 17948, Cycle 26 Core Design)

Page(s)	Description (including summary, reason, initiating document, if applicable)
All	Update document revision number and date.
4	Remove cycle number—duplicate info.
5	GESTAR II Rev 30 per SRLR
7	MCPR <sub>99.9%</sub> for TLO and SLO, per SRLR (AR00402113 LAR-19-043)
8, 20	Cycle 26 MCPR operating limits per SRLR
9	Update SLO MCPR adder and cycle exposure range per SRLR
11	Clarify when non-pressurization limits bound Option A.
20	Change RBM LTSP & AV per Division 60 because SRLR changed AL. Field implemented by EC 18147.
21	Update references per EC 17948.

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### 1.0 **Introduction and Summary**

This report provides the core operating limits for Average Planar Linear Heat Generation Rate (APLHGR), Minimum Critical Power Ratio (MCPR), Linear Heat Generation Rate (LHGR), Oscillation Power Range Monitor (OPRM) Instrumentation and Rod Block Monitor Instrumentation for Columbia Generating Station as required by Technical Specification 5.6.3. As required by Technical Specification 5.6.3, these limits were determined using NRC-approved methodology and are established so that all applicable limits of the plant safety analysis are met. The specific topical report revisions and supplements which describe the methodology utilized in this cycle specific analysis are shown in Table 1.1.

The reload licensing analyses for this cycle provide operating limits for Average Power Range Monitor / Rod Block Monitor and Technical Specifications Improvement Program (ARTS) and Maximum Extended Load Line Limit Analysis (MELLLA) operation which extends the power and flow operating regime for Columbia Generating Station up to the MELLLA boundary for Two Loop Operation (TLO).

The core operating limits are applicable up to 100% of rated thermal power along and below the MELLLA boundary. The minimum flow for operation at rated power is 82.7%. The maximum flow is 106%.

Single Loop Operation (SLO) is restricted to the Extended Load Line Limit Analysis (ELLLA) boundary. The core operating limits for both TLO and SLO are applicable for normal feedwater temperature, feedwater heaters out of service, final feedwater temperature reduction and coastdown. The Pressure Regulator Out of Service (PROOS) MCPR and LHGR limits are applicable if two (2) of the three (3) Digital Electro-hydraulic (DEH) pressure controllers are not functional.

The FSAR and Technical Specification Bases reference the COLR for the most recent approved version of the General Electric Standard Application for Reactor Fuel (GESTAR II), which is listed in Table 1.1. The FSAR references the COLR for the most recent versions of the Supplemental Reload Licensing Report, the Fuel Bundle Information Report, and the GNF2 Fuel Design Cycle-Independent Analyses, which are References 7.2, 7.3 and 7.6. The FSAR references the COLR for the most recent version of the Reference Loading Pattern, which is documented in References 7.2 and 7.5. The FSAR and Technical Specification Bases reference the COLR for the most recent version of the GNF2 Generic Compliance with GESTAR II, which is Reference 7.7.

## Table 1.1

# **Columbia Generating Station Reference Analytical Methods**

NEDE-24011-P-A and NEDE-24011-P-A-US, General Electric Standard Application for Reactor Fuel (GESTAR II) and Supplement for the United States, Revision 30, April 2020.

# 2.0 Average Planar Linear Heat Generation Rate (APLHGR) Limits for Technical Specification 3.2.1

The APLHGR limits for use in Technical Specification 3.2.1, as a function of Average Planar Exposure, shall not exceed the limits shown in the following tables. APLHGR limits for single loop operation for GNF2 fuel are obtained by applying a 1.00 multiplier to the two loop operation APLHGR limits. See Technical Specification 3.2.1 and the applicable Bases for further application details.

a. Table 2.1 – GNF2 Reload Fuel

Table 2.1

Maximum Average Planar Linear Heat Generation Rate (MAPLHGR)

Versus Average Planar Exposure

GNF2 Reload Fuel

0.11 = 1.00.000.1 0.01						
Average Pl	MAPLHGR Limit					
GWd/MTU	GWd/MTU GWd/ST					
0.00	0.00	13.78				
18.92	17.16	13.78				
67.00	60.78	6.87				
70.00	63.50	5.50				

(Reference 7.2 Table 6)

# 3.0 Minimum Critical Power Ratio (MCPR) Operating Limits for Technical Specification 3.2.2

The MCPR operating limits for use in Technical Specification 3.2.2 are determined by the larger of the flow dependent (MCPRf) and power dependent (MCPRp) limits from Table 3.1 through Table 3.7. See Technical Specification 3.2.2 and the applicable Bases for further application details.

The MCPR<sub>99.9%</sub> values used to calculate the MCPR operating limits are 1.08 for two loop operation (TLO) and 1.11 for single loop operation (SLO).

Table 3.1 MCPR Operating Limits Two Loop Operation<sup>1</sup> All Fuel Types

Appl. Group <sup>8</sup>	Exposure Range <sup>2</sup>	Option A	Option B <sup>3</sup>	No Pressur Even	ization
1	Equipment In Service			TLO	SLO
	Full Power Limits (BOC to MOC1)			1.33	1.46
	Full Power Limits (MOC1 to MOC2)			1.30	1.46
	Full Power Limits (MOC2 to EOC)	1.35	1.31		1.46
	Flow Dependent Limits <sup>5</sup>		Table 3.	7	
	Power Dependent Limits <sup>6</sup>		Table 3.	2	
2	<b>EOC RPT Out of Service (RPTOOS)</b>				
	Full Power Limits (BOC to MOC1)	1.35	1.28	1.33	1.46
	Full Power Limits (MOC1 to MOC2)	1.35	1.28	1.30	1.46
	Full Power Limits (MOC2 to EOC)	1.40	1.33		1.46
	Flow Dependent Limits <sup>5</sup>		Table 3.	7	
	Power Dependent Limits <sup>6</sup>		Table 3.	3	
3	<b>Turbine Bypass Valves Out of Serv</b>	ice (TBVOC	S)		
	Full Power Limits (BOC to MOC1)	1.34	1.29	1.33	1.46
	Full Power Limits (MOC1 to MOC2)	1.34	1.29	1.30	1.46
	Full Power Limits (MOC2 to EOC)	1.39	1.34		1.46
	Flow Dependent Limits <sup>5</sup>	Table 3.7			
	Power Dependent Limits <sup>6</sup>	Table 3.4			
4	TBVOOS and RPTOOS				
	Full Power Limits (BOC to MOC1)	1.38	1.31	1.33	1.46
	Full Power Limits (MOC1 to MOC2)	1.38	1.31		1.46
	Full Power Limits (MOC2 to EOC)	1.44	1.37		1.46
	Flow Dependent Limits <sup>5</sup>		Table 3.	7	
	Power Dependent Limits <sup>6</sup>		Table 3.	5	
5	Pressure Regulator Out of Service	(PROOS)			
	Full Power Limits (BOC to MOC1)	1.32		1.33	1.46
	Full Power Limits (MOC1 to MOC2)		1.25	1.30	1.46
	Full Power Limits (MOC2 to EOC)	1.37	1.31		1.46
	Flow Dependent Limits <sup>5</sup>	Table 3.7			
	Power Dependent Limits <sup>6,7</sup>	Table 3.6		Do ation 1	

(Reference 7.2 Section 11)

#### **Notes for Table 3.1**

Note 1: For Single Loop Operation (SLO), the MCPR Operating Limit increases by the SLO adder, 0.03, from the limit in Table 3.1. See Notes 5 and 6 for application details.

(Reference 7.2 Section 11)

Note 2: The cycle exposure range designation is defined in Table 3.1-1 for use in Table 3.1. End of Rated (EOR) is defined as the cycle exposure corresponding to all rods out, 100% power, 100% flow and normal feedwater temperature.

Table 3.1-1

Cycle Exposure Range Designation

Name	Exposure Range
BOC to MOC1	≤ 2341 MWd/ST
MOC1 to MOC2	≤ EOR-4473 MWd/MTU (4058 MWd/ST)
MOC2 to EOC	> EOR-4473 MWd/MTU (4058 MWd/ST)

(Reference 7.2 Sections 7 & 10)

Note 3: The NRC has concluded that a statistical approach (Option B) may be used for pressurization events analyzed with TRACG (Reference 7.4, Section 7.5.2.6). In order to take credit for conservatism in the scram speed performance, it must be demonstrated that there is insufficient reason to reject the plant-specific scram speed as being within the distribution assumed in the statistical analysis.

The procedure described below determines the full power MCPR limit based on the scram times of SR 3.2.2.2. If the scram speed distribution is not within the assumed distribution, the MCPR limit for pressurization events must be reestablished based on an interpolation between the applicable limits for Option A (scram times of LCO 3.1.4, "Control Rod Scram Times") and Option B (realistic scram times) analyses.

The surveillance information for the fuel cycle is the number of active control rods measured for each surveillance test (the first test is at the BOC and is denoted  $N_1$ ; the i<sup>th</sup> test denoted  $N_i$ ) and the average scram time to Notch 39 for the active rods measured in test i denoted  $\tau_i$ .

The equation used to calculate the overall average of all the scram data generated to date in the cycle is:

$$\tau_{ave} = \frac{\sum_{i=1}^{n} N_i \tau_i}{\sum_{i=1}^{n} N_i} \tag{1}$$

where:

n = number of surveillance tests performed to date in the cycle;

$$\sum_{i=1}^{n} N_{i} =$$
 total number of active rods measured to date in the cycle; and

$$\sum_{i=1}^{n} N_i \tau_i =$$

sum of the scram time to Notch 39 of all active rods measured to date in the cycle to comply with the Technical Specification surveillance requirements.

The average scram time,  $\tau_{ave}$ , is tested against the analysis mean using the following equation:

$$\tau_{ave} \le \tau_B$$
 (2)

where:

$$\tau_B = \mu + 1.65 \sqrt{\frac{N_1}{\sum_{i=1}^n N_i}} \sigma \tag{3}$$

 $\mu$  = 0.589 seconds (mean scram time to Notch 39 used in the Option B analysis, Reference 7.8, Section 5.0)

σ = 0.0101 seconds (standard deviation of μ, Reference 7.8, Section 5.0)

N<sub>1</sub> = total number of active rods measured at BOC to comply with the Technical

Specification surveillance requirements.

If the cycle average scram time satisfies the Equation 2 criterion, continued plant operation under the Option B MCPR limits for pressurization events is permitted. If not, the MCPR limits for pressurization events must be re-established, based on a linear interpolation between the Option B and Option A MCPR limits.

The equation to establish the new operating limit is given below:

$$OLMCPR_{New} = \left(OLMCPR_{OptionB} + \frac{\tau_{ave} - \tau_{B}}{\tau_{A} - \tau_{B}}(SSAF)\right)$$
(4)

where:

 $\tau_{\text{ave}}$  and  $\tau_{\text{B}}$  = defined in Equations 1 and 3, respectively

 $\tau_A = 0.866$  seconds (the Technical Specification limit

on core average scram time to Notch 39)

SSAF =  $OLMCPR_{Option A}$  -  $OLMCPR_{Option B}$  (the difference

between the MCPR calculated using Option A and that using Option B for pressurization

events from Table 3.1)

 $OLMCPR_{Option A} =$  the limiting pressurization event Option A

MCPR limit

 $OLMCPR_{Option B} =$  the limiting pressurization event Option B

MCPR limit

If continued plant operation under the Option B MCPR limits for pressurization events is permitted, the Full Power Limit is the maximum of OLMCPR<sub>Option B</sub> and, if applicable, the Full Power Limit for Non-Pressurization Events. Otherwise, the Full Power Limit is the maximum of OLMCPR<sub>New</sub> and, if applicable, the Full Power Limit for Non-Pressurization Events. Option A and B limits are not specified, when Option A is less or equal to the Full Power Limit for Non-Pressurization Events. (Reference 7.2 Section 11)

Note 4: The Full Power Limit for Non-Pressurization Events is specified when greater than the Option B Full Power Limit for Pressurization Events. See Note 3 for application guidance. The Full Power Limit for Non-Pressurization Events only applicable to TLO is labeled TLO. The Full Power Limit for Non-Pressurization Events only applicable to SLO is labeled SLO. (Reference 7.2 Section 11)

Note 5: Flow dependent MCPR limits (MCPRf) are applicable to TLO and require the SLO adder when operating in SLO. (Reference 7.2 Section 11 & Appendix D)

Note 6: Pbypass is 29.5% of rated power.

Power dependent MCPR limits are provided for core thermal powers greater than or equal to 25% of rated power at all core flows. The power dependent MCPR limits for core thermal powers below Pbypass are subdivided by core flow. A step change in the power dependent MCPR limits occurs at Pbypass because direct scrams on turbine throttle valve closure and turbine governor valve fast closure are automatically bypassed below Pbypass and not applicable per Technical Specification 3.3.1.1.

The power dependent MCPR limits in Tables 3.2 through 3.6 are provided as Kp multipliers above Pbypass and as absolute MCPRp limits below Pbypass. MCPRp limits above Pbypass are determined through the following equation: MCPRp = Kp × (Full Power Limit). Power dependent MCPR limits are applicable to TLO and require the SLO adder when operating in SLO.

(Reference 7.2 Section 11 & Appendix D)

Note 7: At power levels greater than 65%, the pressure regulator failure downscale event is terminated by the APRM Neutron Flux - High scram. At power levels less or equal 65%, the pressure regulator failure downscale event is terminated by the Reactor Vessel Steam Dome Pressure - High scram.

(Reference 7.8, Section 4.4.1)

Note 8: All Application Groups include one TBVOOS.

(Reference 7.8, Sections 3.0 & 4.4.1)

Table 3.2

# Columbia Generating Station Application Group 1: Equipment In Service TLO Power Dependent MCPR Limits All Fuel Types

Limits for Power ≤ 29.5%	7111 401	71	
Power (%) Limit for Flo			Limit for Flow < 50.0% MCPRp
25.0	2.	15	1.98
29.5	2.	10	1.97
Limits for Power > 29.5%			
Power (%)		Limit Kp	
29.5		1.130	
45.0		1.089	
60.0		1.085	
85.0		1.040	
100.0			1.000

Table 3.3

# Columbia Generating Station Application Group 2: EOC RPT Out of Service (RPTOOS) TLO Power Dependent MCPR Limits All Fuel Types

Limits for Power ≤ 29.5%						
Power (%) Limit for Flo			Limit for Flow < 50.0% MCPRp			
25.0	2.	15	1.98			
29.5	2.	10	1.97			
Limits for Power > 29.5%						
Power (%)		Limit Kp				
29.5		1.134				
45.0			1.090			
60.0		1.085				
85.0		1.043				
100.0			1.000			

Table 3.4

Columbia Generating Station

Application Group 3: Turbine Bypass Valve Out of Service (TBVOOS)

TLO Power Dependent MCPR Limits

All Fuel Types

Limits for Power ≤ 29.5%			
Power (%)		ow ≥ 50.0% PRp	Limit for Flow < 50.0% MCPRp
25.0	2.	69	2.61
29.5	2.	52	2.49
Limits for Power > 29.5%			
Power (%)		Limit Kp	
29.5		1.136	
45.0			1.095
60.0		1.092	
85.0		1.056	
100.0			1.000

Table 3.5

Columbia Generating Station
Application Group 4: TBVOOS and RPTOOS
TLO Power Dependent MCPR Limits
All Fuel Types

Limits for Power ≤ 29.5%						
Power (%)	Limit for FI MC	ow ≥ 50.0% PRp	Limit for Flow < 50.0% MCPRp			
25.0	2.	69	2.61			
29.5	2.	52	2.49			
Limits for Power > 29.5%						
Power (%)		Limit Kp				
29.5		1.145				
45.0			1.097			
60.0		1.092				
85.0		1.060				
100.0			1.000			

Table 3.6

Columbia Generating Station

Application Group 5: Pressure Regulator Out of Service (PROOS)

TLO Power Dependent MCPR Limits

All Fuel Types

Limits for Power ≤ 29.5%					
(75)		low ≥ 50.0% Limit for Flow < 5 $CPRp$ MCPRp			
25.0	2.	15	2.09		
29.5	2.	10	2.05		
Limits for Power > 29.5%			•		
Power (%)		Limit <i>Kp</i>			
29.5		1.407			
45.0		1.309			
60.0		1.266			
65.0		1.239			
65.0		1.182			
85.0		1.101			
100.0		1.000			

Table 3.7

Columbia Generating Station
All Application Groups
TLO Flow Dependent MCPR Limits
All Fuel Types

Flow (%)	Limit MCPRf
30.0	1.53
70.0	1.29
80.0	1.20
108.5	1.20

## 4.0 Linear Heat Generation Rate (LHGR) Limits for Technical Specification 3.2.3

The LHGR limits for use in Technical Specification 3.2.3 are provided as a function of pellet exposure, power and flow for GNF2 fuel. The LHGR limits shall not exceed the product of the exposure dependent LHGR limit and the minimum of the power dependent LHGR Factor (LHGRFACp) or the flow dependent LHGR Factor (LHGRFACf).

- a. The exposure dependent LHGR limits are provided in the Fuel Bundle Information Report (Reference 7.3) for GNF2.
- b. The power dependent LHGR Factor (LHGRFACp) is provided in Table 4.1 through Table 4.5 for all fuel types. (Reference 7.2, Appendix D)
- c. The flow dependent LHGR Factor (LHGRFACf) is provided in Table 4.6 for all fuel types. (Reference 7.2, Appendix D)

See Technical Specification 3.2.3 and the applicable Bases for further application details.

Table 4.1

Columbia Generating Station
Application Group 1: Equipment In Service<sup>9</sup>
Power Dependent LHGR Factor (LHGRFACp)
All Fuel Types

Limits for Power ≤ 29.5%							
Power (%)	Limit for Flow ≥ 50.0%  LHGRFACp		Limit for Flow < 50.0% LHGRFACp				
25.0	0.5	527	0.527				
29.5	0.5	527	0.527				
Limits for Power > 29.5%	Limits for Power > 29.5%						
Power (%)		Limit LHGRFACp					
29.5		0.634					
45.0			0.713				
60.0		0.791					
85.0		0.922					
100.0			1.000				

<sup>9</sup> All Application Groups include one TBVOOS.

Table 4.2

# Columbia Generating Station Application Group 2: EOC RPT Out of Service (RPTOOS)<sup>9</sup> Power Dependent LHGR Factor (LHGRFACp) All Fuel Types

Limits for Power ≤ 29.5%				
Power (%)		<b>ow ≥ 50.0%</b> RFACp	Limit for Flow < 50.0% LHGRFACp	
25.0	0.527		0.527	
29.5	0.527		0.527	
Limits for Power > 29.5%				
Power (%)		Limit LHGRFACp		
29.5	0.634		0.634	
45.0		0.713		
60.0		0.791		
85.0		0.922		
100.0		1.000		

Table 4.3

# Columbia Generating Station Application Group 3: Turbine Bypass Valve Out of Service (TBVOOS) Power Dependent LHGR Factor (LHGRFACp) All Fuel Types

Limits for Power ≤ 29.5%				
Power (%)		<b>ow ≥ 50.0%</b> RFACp	Limit for Flow < 50.0% LHGRFACp	
25.0	0.380		0.420	
29.5	0.414		0.420	
Limits for Power > 29.5%				
Power (%)		Limit LHGRFACp		
29.5		0.634		
45.0		0.713		
60.0		0.735		
85.0	0.902			
100.0		1.000		

Table 4.4

# Columbia Generating Station Application Group 4: TBVOOS and RPTOOS Power Dependent LHGR Factor (LHGRFACp) All Fuel Types

Limits for Power ≤ 29.5%				
Power (%)	Limit for Flow ≥ 50.0%  LHGRFACp		Limit for Flow < 50.0% LHGRFACp	
25.0	0.380		0.420	
29.5	0.414		0.420	
Limits for Power > 29.5%				
Power (%)		Limit LHGRFACp		
29.5	0.634		0.634	
45.0	0.713		0.713	
60.0		0.735		
85.0	85.0 0.902		0.902	
100.0		1.000		

Table 4.5

Columbia Generating Station

Application Group 5: Pressure Regulator Out of Service (PROOS)<sup>9,10</sup>

Power Dependent LHGR Factor (LHGRFACp)

All Fuel Types

Limits for Power ≤ 29.5%					
Limit for Flow ≥ 50.0%  LHGRFACp		Limit for Flow < 50.0% LHGRFACp			
0.527		0.527			
0.527		0.527			
	Limit LHGRFACp				
	0.634				
	0.672				
	0.728				
	0.728				
	0.909				
	1.000				
	LHGR 0.5	LHGRFACp 0.527			

Table 4.6

Columbia Generating Station
All Application Groups
Flow Dependent LHGR Factor (LHGRFACf)
All Fuel Types

Flow (%)	Limit LHGRFACf	
30.0	0.592	
50.0	0.761	
80.0	0.966	
85.0	1.000	
108.5	1.000	

(Reference 7.8, Section 4.4.1) COLR-01, Revision 26.0

At power levels greater than 65%, the pressure regulator failure downscale event is terminated by the APRM Neutron Flux - High scram. At power levels less or equal 65%, the pressure regulator failure downscale event is terminated by the Reactor Vessel Steam Dome Pressure – High scram.

# 5.0 Oscillation Power Range Monitor (OPRM) Instrumentation for Technical Specification 3.3.1.1

5.1 Period Based Detection Algorithm (PBDA) trip setpoints for Technical Specification Table 3.3.1.1-1, Footnote (g) and THERMAL POWER value for use in Table 3.3.1.1-1, Footnote (f). See Technical Specification 3.3.1.1 and the applicable Bases for further application details.

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	TRIP SETPOINT
2 Average Power Range Monitors		
f. OPRM Upscale Amplitude Trip (Sp) Confirmation Count (Np)	(f)	1.15 Peak/Average 16

(f) THERMAL POWER ≥ 19.6% RTP.

(Reference 7.2, Section 15.1) (Reference 7.1, Table 3-2, Item 8.9)

5.2 THERMAL POWER value for Technical Specification 3.3.1.1, Required Action J.1:

THERMAL POWER < 19.6% RTP (Reference 7.1, Table 3-2, Item 8.9)

5.3 OPRM Not Bypassed setpoints for SR 3.3.1.1.17

APRM Simulated Thermal Power (Pb) ≥ 24.6 %

Recirculation Drive Flow (Wb) < 60 %

(Reference 7.2, Section 15.2)

(Reference 7.1, Table 3-2, Item 8.9)

## 6.0 Rod Block Monitor Instrumentation for Technical Specification 3.3.2.1

6.1 Rod Block Monitor Instrumentation for Technical Specification Table 3.3.2.1-1, Footnote (f) and Licensee Controlled Specifications Table 1.3.2.1-2 and Appendix A. See Technical Specification 3.3.2.1 and the applicable Bases for further application details.

	FUNCTION	LIMITING TRIP SETPOINT	ALLOWABLE VALUE
1	Rod Block Monitor		
	a. Low Power Range – Upscale	118.2	118.6
	b. Intermediate Power Range – Upscale	113.2	113.6
	c. High Power Range – Upscale	108.2	108.6

(Reference 7.1, Table 3-2, Item 10.7)

6.2 Rod Block Monitor (RBM) Instrumentation MCPR limits for Technical Specification Table 3.3.2.1-1, Footnotes (a), (b) and (c). See Technical Specification 3.3.2.1 and the applicable Bases for further application details.

THERMAL POWER	RBM MCPR Limit
< 90 % RTP	1.72
≥ 90 % RTP	1.41

(Reference 7.2, Section 10)

#### 7.0 References

- 7.1 Design Specification for Division 60, "Reactor Core and System Analysis Parameters for Columbia Generating Station."
- 7.2 005N5088, Revision 0, "Supplemental Reload Licensing Report for Columbia Reload 25 Cycle 26," February 2021.
- 7.3 005N5089, Revision 0, "Fuel Bundle Information Report for Columbia Reload 25 Cycle 26," November 2020.
- 7.4 NEDE-32906P-A, Revision 3, "TRACG Application for Anticipated Operational Occurrences (AOO) Transient Analyses," GE Nuclear Energy, September 2006.
- 7.5 005N5090, Revision 0, "Nuclear Design Report for Columbia Cycle 26," October 2020.
- 7.6 002N3439, Revision 4, GNF2 Fuel Design Cycle-Independent Analyses for Energy Northwest Columbia Generating Station, February 2019.
- 7.7 NEDC-33270P, Revision 11, "GNF2 Advantage Generic Compliance with NEDE-24011-P-A (GESTAR II)," August 2020.
- 7.8 005N2925, Revision 1, "Columbia Generating Station Option B' Scram Speed Implementation," March 2020.