

License Amendment Request to Remove Instrumented Fuel Element Requirements from Technical Specifications

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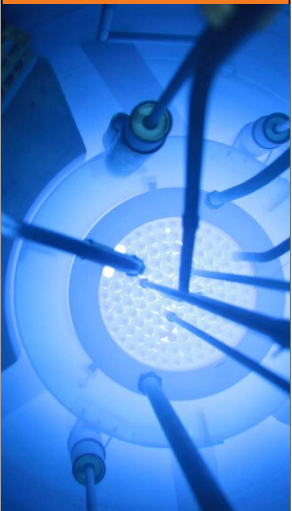


Background

The Oregon State TRIGA[®] Reactor (OSTR) operations staff had a Phase Zero meeting with the NRC on 1/8/20 to discuss removing instrumented fuel element (IFE) requirements from the technical specifications in support of returning pulsing capabilities without IFE requirements.

Questions were asked regarding the LEU conversion pulsing analysis.

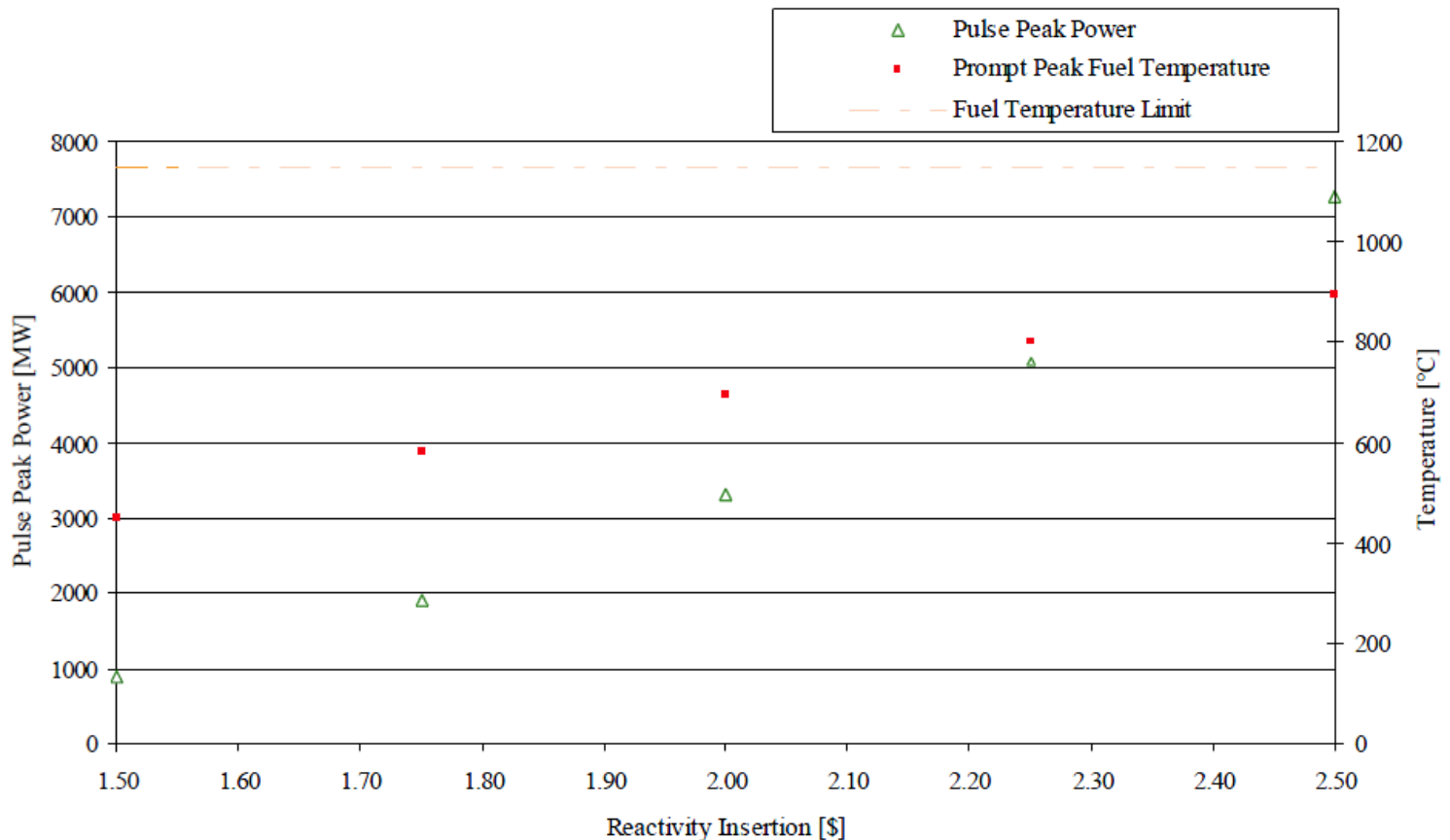
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Conversion Pulse Analysis

Prompt peak fuel temperature is linear to reactivity.
Interpolation shows that 830°C is exceeded at \$2.33. Thus the reactivity limit for OSTR was set at \$2.30.

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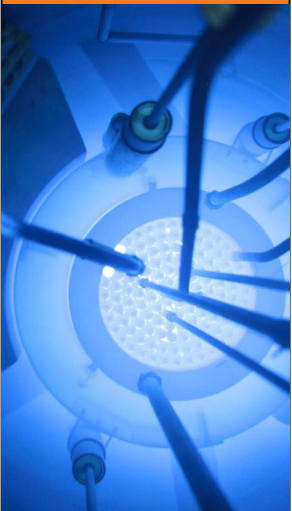
Uncertainty Analysis

The NRC asked why there was no uncertainty stated in the thermal hydraulic analysis.

The analysis was performed in RELAP, a deterministic code that does not compute uncertainty.

The OSTR staff decided to review pulsing data to determine the uncertainty within actual pulse data.

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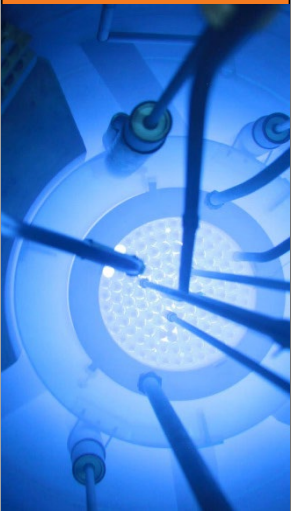
Test Pulse

It was decided that the most consistent data to analyze was the OSTR test pulses. Per procedure, a \$1.75 test pulse is performed every six months to determine how three key parameters change:

- Peak Temperature (in degrees C)
- Peak Power (in MW)
- Integrated Pulse Energy (in kW-hr)

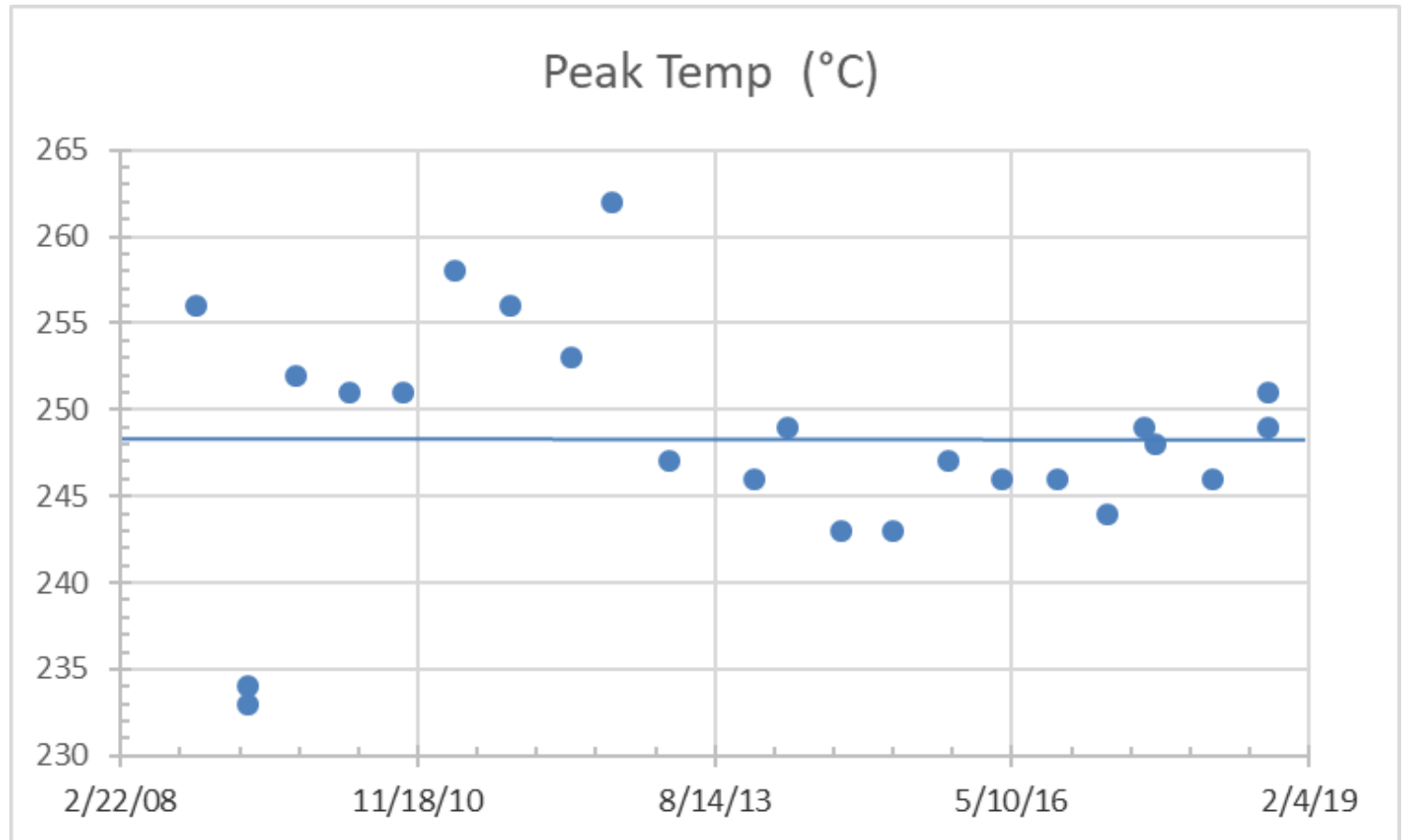
These pulses are performed in a consistent manner, with a cold (room temperature), clean (xenon-free, Monday morning) core.

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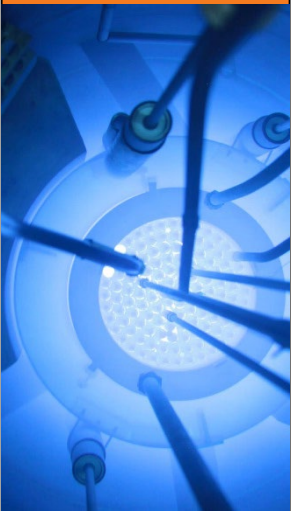


Peak Temperature of Test Pulses

This plot shows the peak temperature of \$1.75 test pulses over the course of LEU fuel life (blue line = average).

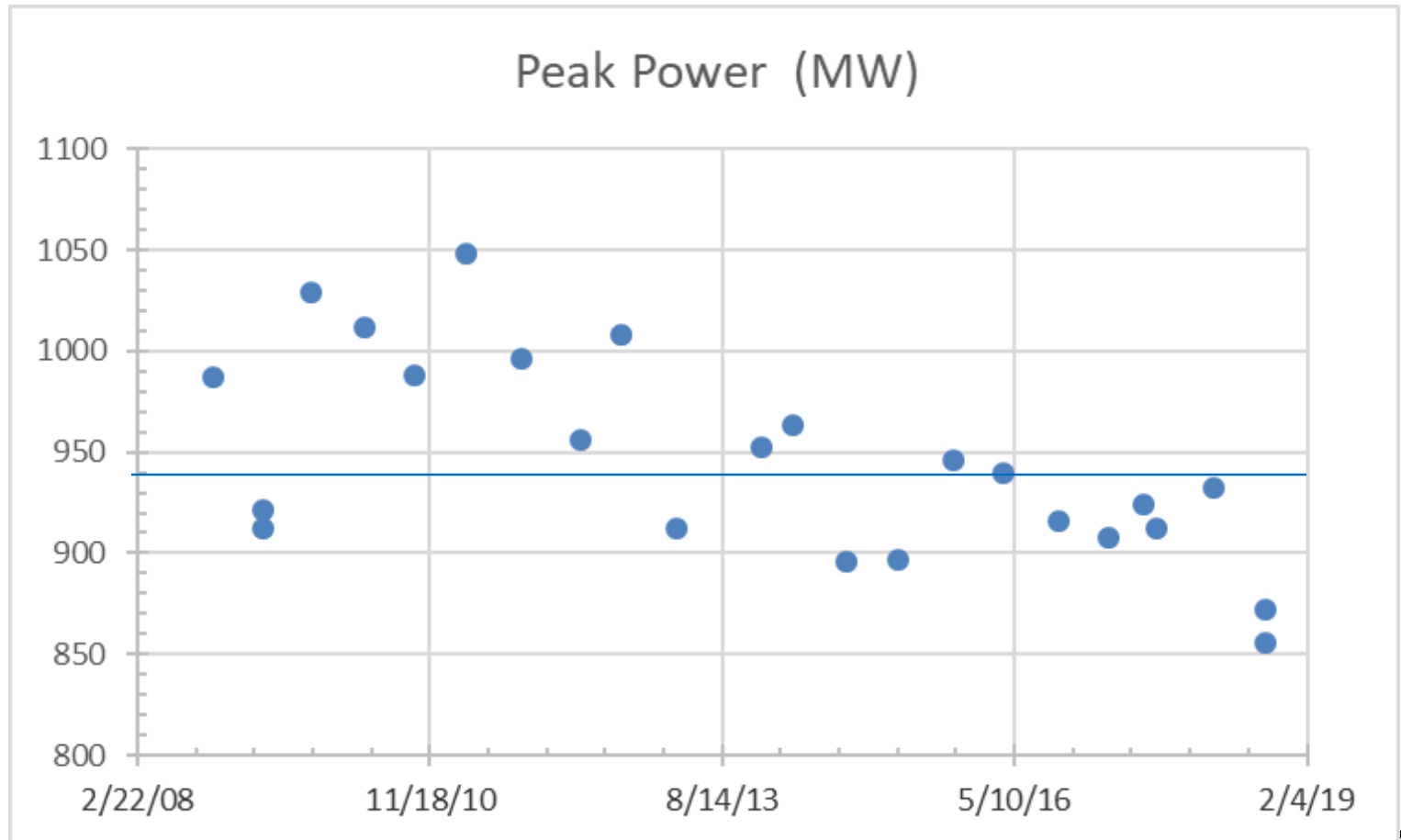


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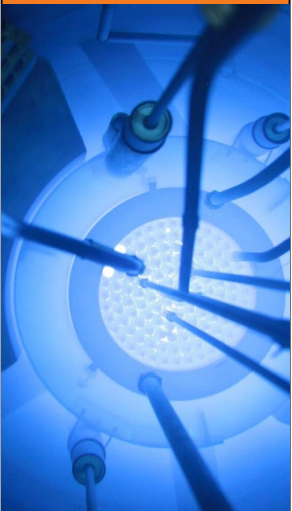


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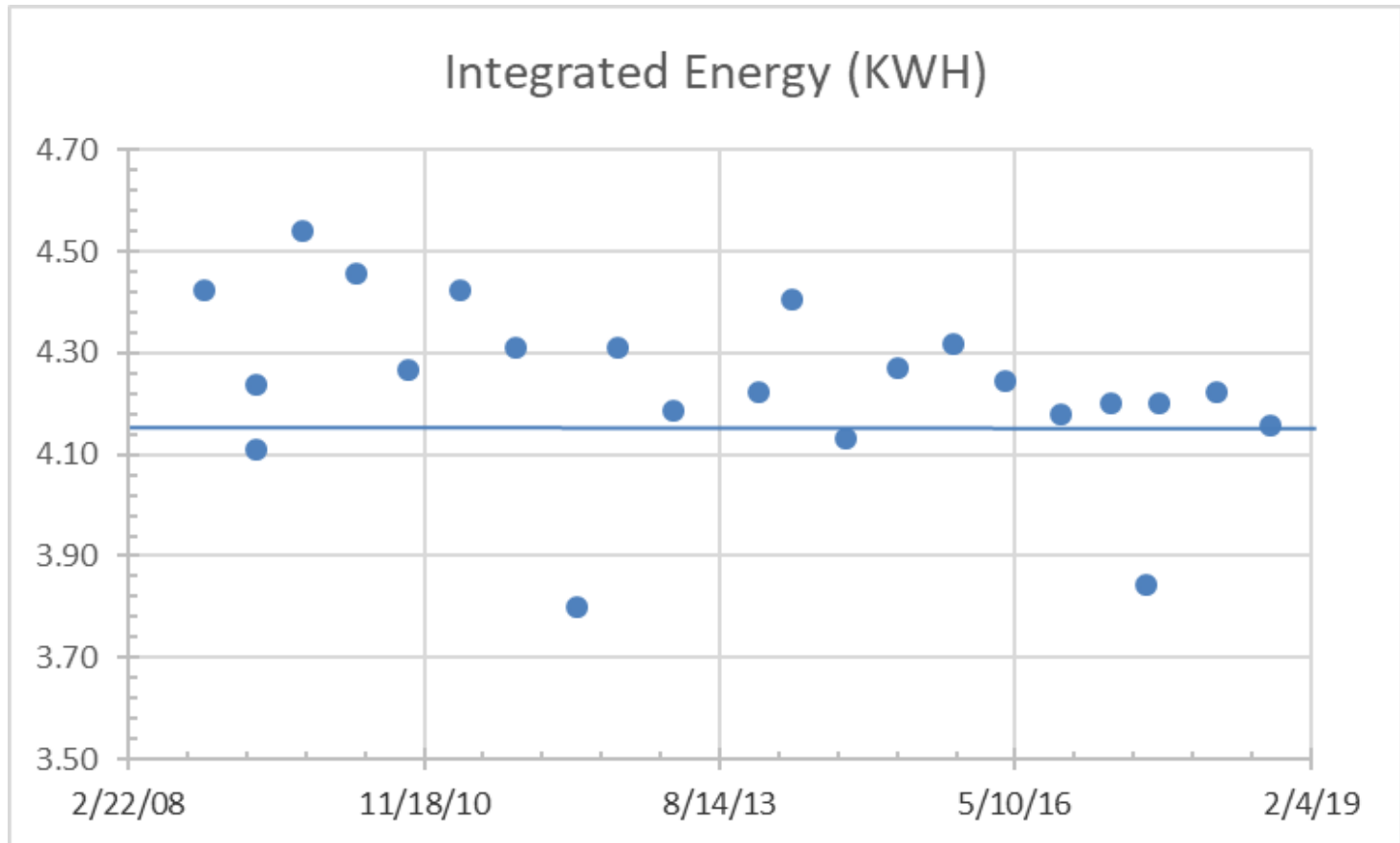


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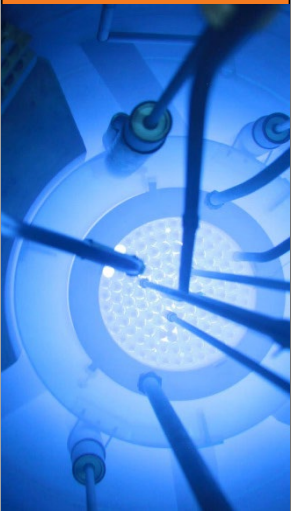


Integrated Energy of Test Pulses

This plot shows the integrated energy of \$1.75 test pulses over the course of LEU fuel life (blue line = average).



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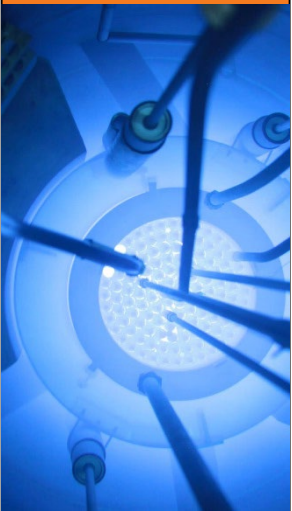


Analysis of Test Pulse Data

The following table shows the average of the three parameters (with 95% confidence) and how they compare to the maximum and minimum values.

	Peak Temp (°C)	Peak Power (MW)	Energy (KWH)
Average	248 ± 14	945 ± 100	4.237 ± 0.348
Max	262	1048	4.539
Min	233	856	3.800

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Further Analysis

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OSTR realized that there was significant variance in the data from 2008-2013. This may be due to the previous reflector that was replaced in the summer of 2013. The reflector was replaced due to water in-leakage, which causes all gaps within the reflector can to fill with water.

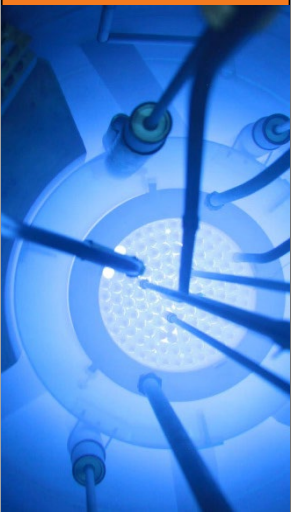
This was not a trivial event. The entire core was defueled, ALL items were removed from the tank, the reflector core was replaced, and all items were reinstalled.

The water in-leakage may have caused some variance in the pulse data. The post-reflector data was further analyzed.

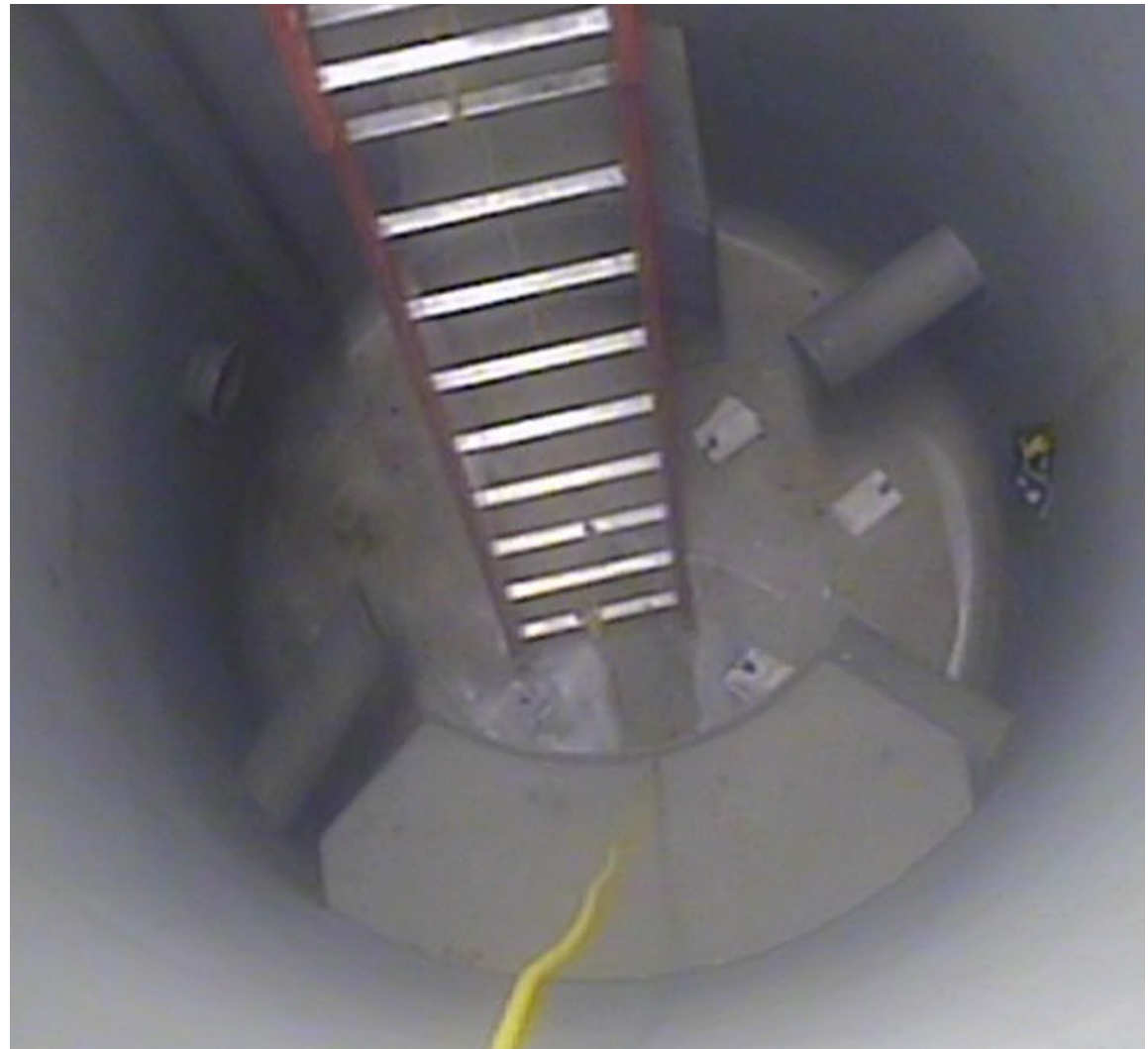
Removal of Original Reflector



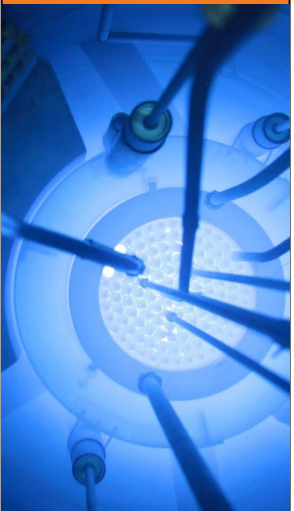
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Empty Reactor Tank

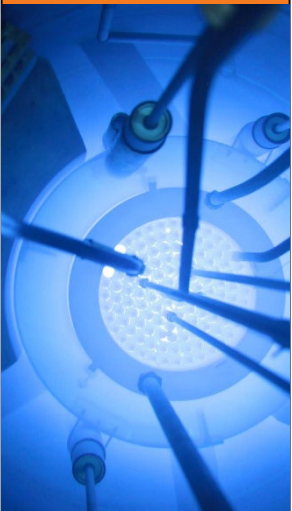


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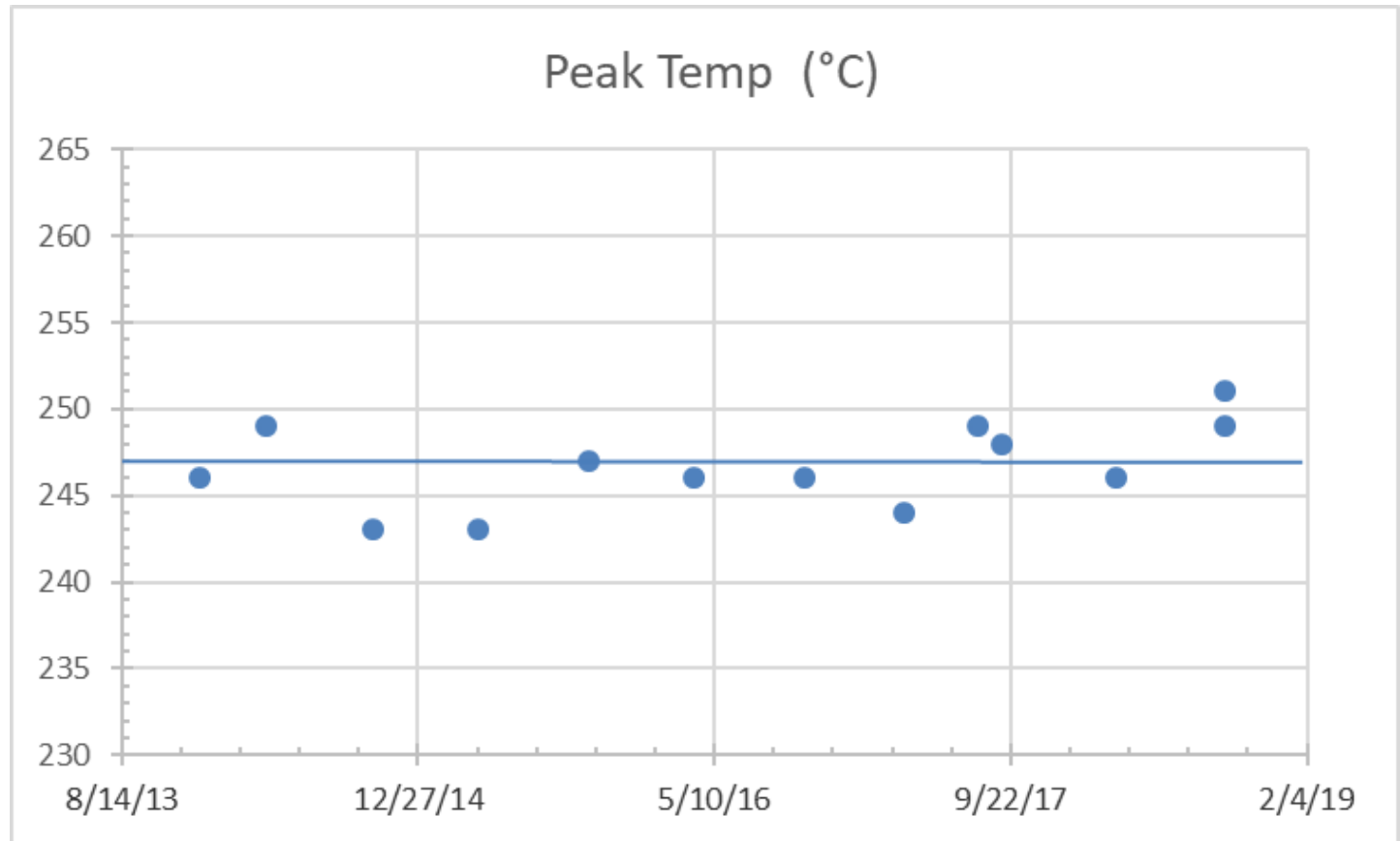
Brand New Leak-Free Reflector

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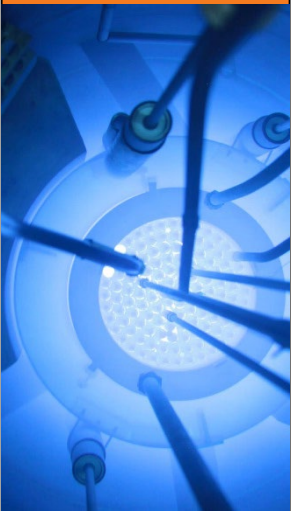


Peak Temperature of Post-Reflector Changeout Test Pulses

This plot shows the peak temperature of \$1.75 test pulses post-reflector changeout (blue line = average).

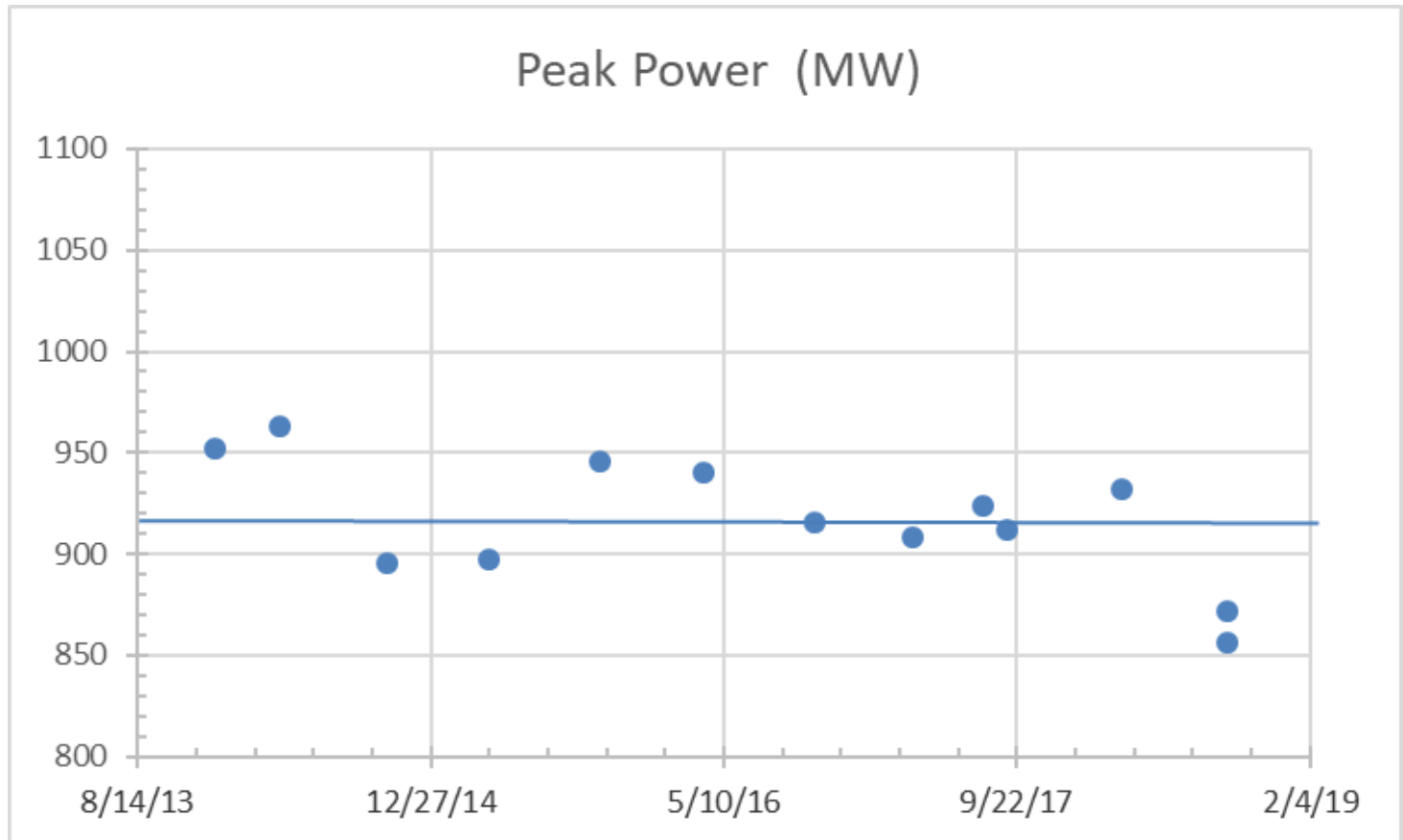


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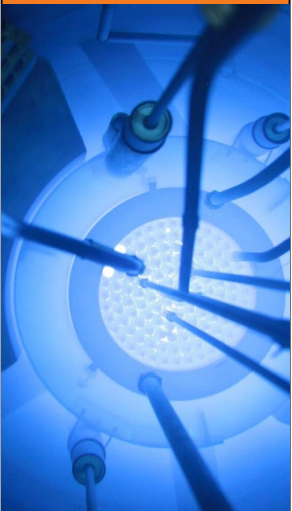


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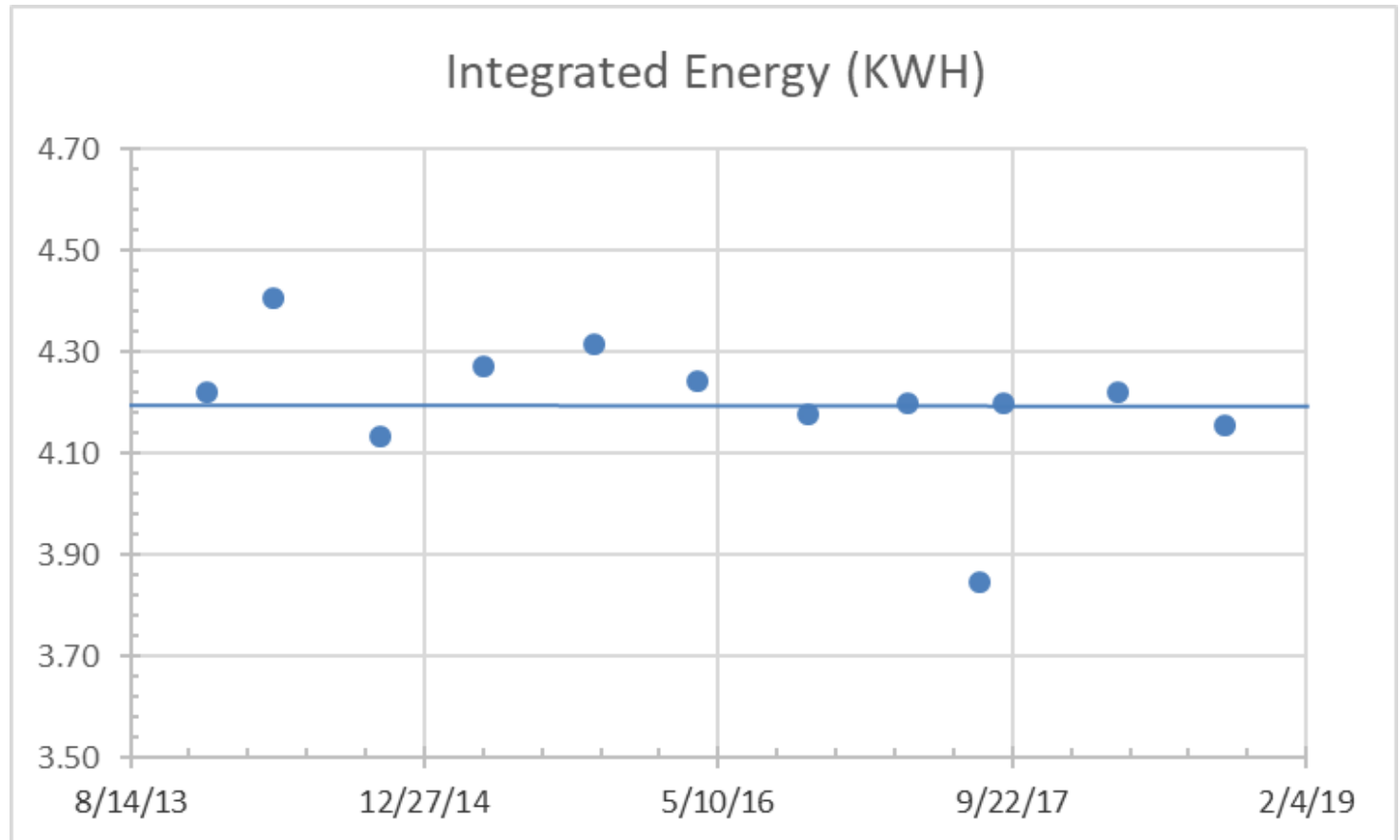


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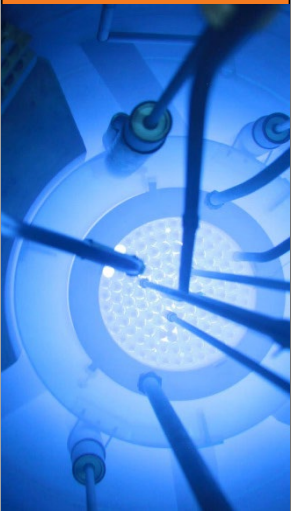


Integrated Energy of Post-Reflector Changeout Test Pulses

This plot shows the integrated energy of \$1.75 test pulses post-reflector changeout (blue line = average).



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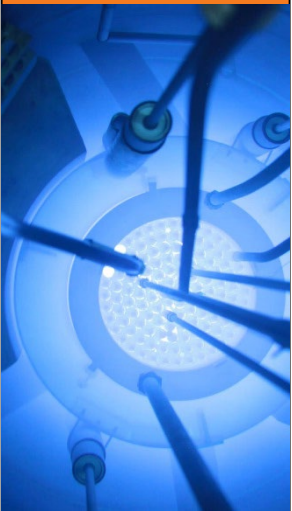


Analysis of Post-Reflector Changeout Test Pulse Data

The following table shows the average of the three parameters (with 95% confidence) and how they compare to the maximum and minimum values.

	Peak Temp (°C)	Peak Power (MW)	Energy (KWH)
Average	247 ± 4	916 ± 62	4.199 ± 0.268
Max	251	963	4.406
Min	243	856	3.844

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Conclusion

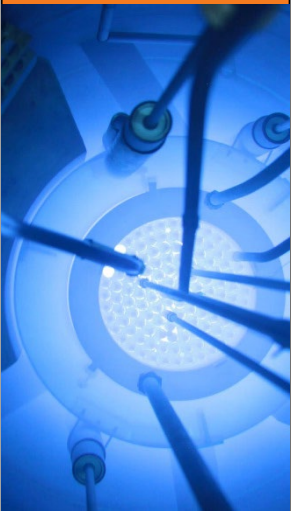
Over the last six years:

The IFE peak temperature results show a very minimal variance in pulse temperatures (less than 2%).

The peak power has a variance of approximately 7%.

The integrated energy has a variance of less than 8%.

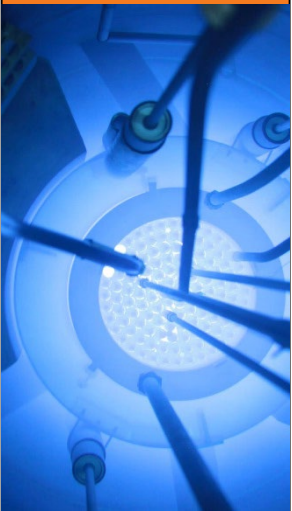
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Proposed Technical Specification

The OSTR staff feels that the current technical specification of limiting pulses to temperatures not to exceed 830 C should be rewritten to be based upon reactivity limits. The current basis states that the reactivity should be limited to $\beta_{2.30}$ and we believe the technical specification should be re-written as such and that the thermal hydraulic analysis is conservative enough to show that keeping reactivity insertions below this limit will permit safe pulsing of the OSTR.

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Questions?

