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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

July 16, 2003

Attention: Ms. Eva Brown, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Reference: Turkey Point Plant Units 3 and 4 (Docket Nos. 50-250 and 50-251), FPL Submittal Letter L-2002-214, dated November 26, 2002

Subject: RAI Regarding Request for Withholding Information From Public Disclosure (TAC Nos. MB6909 and MB6910)

Dear Ms. Brown:

Holtec is in receipt of your letter on the subject matter, dated July 10, 2003. We are in agreement with your assessment that portions of the information on page 6-24 of our Report HI-2022931, Revision 0 are inappropriately denoted as proprietary. Some of the information, in the area designated as proprietary, was taken from a Lawrence Livermore National Laboratory Report, as noted in your letter. Therefore, this portion cannot be withheld from the public. However, the remainder of this section includes fuel weight, fuel mass modeling information and computational derivations of impact loads. We consider this data to be proprietary, because it pertains to manufacturing details (i.e., fuel grid loading points) provided by the fuel vendor under a proprietary agreement and also contains Holtec modeling and computational details that have been developed from many hours of research and development to produce accurate and realistic analytical results.

Please reconsider our application and affidavit using the attached revised pages. As may be seen, the proprietary designation has been reduced to only include the fuel data and computational methodology described above. One page (6-24) is provided for the proprietary version of Report HI-2022931 and one page is provided for the non-proprietary version. Please note that insertion of these pages into the original does not change any of the results or conclusions. The only change is in the amount of information designated as proprietary. Therefore, the affidavit that was originally submitted remains valid. Accordingly, please withhold from public disclosure, the attached page marked proprietary.

We hope that the changes to the proprietary information designations meet with your approval. If there are any questions or comments, please feel free to call me at (856) 797-0900 x651.

Sincerely,

Scott H. Pellet

Scott H. Pellet
Holtec Project Manager

SP:mm

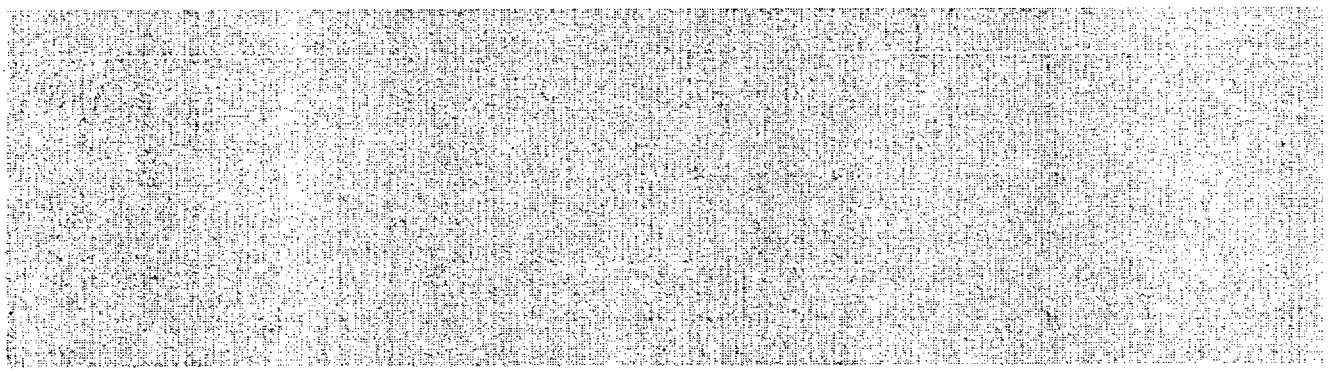
Attachments
emcc: Glenn Adams (FPL, Project Manager-Juno Beach) w/att
Walter Parker (FPL, Project Manager-PTN Site) w/att

Doc ID: 1253-2

6.8.4.2 Fuel to Cell Wall Impact Loads

A review of all simulations performed allows determination of the maximum instantaneous impact load between fuel assembly and fuel cell wall at any modeled impact site. The maximum fuel/cell wall impact load value is 223 lbs, which occurs during simulations 1, 2, and 3.

The permissible lateral load on an irradiated fuel assembly has been studied by the Lawrence Livermore National Laboratory. The LLNL report [6.8.1] states that "...for the most vulnerable fuel assembly, the axial buckling load varies from 82g's at initial storage to 95g's after 20 years storage. In a side drop, no yielding is expected below 63g's at initial storage to 74g's after 20 years {dry} storage." The most significant load on the fuel assembly arises from rattling during the seismic event.



a = permissible lateral acceleration in g's (a=63)

Therefore, a maximum fuel assembly-to-cell wall impact load of 223 lbs is provided with a safety factor of about 113.

6.9 Rack Structural Evaluation

As stated above, for this project the allowable stress values are taken to be those corresponding to normal conditions. This is conservative, since the increase in stress allowables for OBE and SSE