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SUBJECT: Forwards "Analysis for Extended Operation of Part-Length
Shielded Assemblies..." & affidavit.Rept withheld.

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Carolina Power & Light Company

JUL 28 1988

SERIAL: NLS-88-154

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
CYCLE 13 OPERATION
PARTIAL LENGTH SHIELDED ASSEMBLIES (PLSA)

Gentlemen:

This letter is to inform you of Carolina Power & Light Company's plans concerning the Flux Reduction Program for the upcoming Cycle 13 operation at the H. B. Robinson Steam Electric Plant Unit No. 2.

Recent evolutions in the Pressurized Thermal Shock (PTS) issue (documented in detail by our letter dated January 16, 1987) have demonstrated that continued use of the current design of the Partial Length Shielded Assemblies (PLSAs) may not be necessary or appropriate for the entire life of the vessel. Discussion accompanying the PTS Safety Evaluation Report (SER) dated June 19, 1987 recognized that the current Flux Reduction Program was developed prior to these evolutions. The basis for the acceptance stated in that SER limited its consideration of the Flux Reduction Program to the requirement that the "future core loadings continue to provide sufficient flux reduction so that the 10CFR50.61 acceptance criteria are met." Therefore, CP&L will periodically reevaluate the Flux Reduction Program to ensure that the amount and location of the shielding provided is appropriate. Factors such as developments in the understanding of the embrittlement phenomenon, the potential plant life extension, and possible alternative approaches to PTS risk reduction will be evaluated against the economic and operational cost of the PLSAs. Since modification of the PLSA design would require changes to the FSAR, any changes to the Flux Reduction Program will be evaluated under the provisions of 10CFR50.59 and will comply with 10CFR50.61.

The original analysis, XN-NF-83-71P, and subsequent NRC Safety Evaluation Report dated October 24, 1984 approved use of the original PLSAs for three cycles of operation which would expire at the end of the current Cycle 12. Subsequent mechanical design analysis, performed by Advanced Nuclear Fuels, has demonstrated that the existing assemblies are capable of up to a total of six cycles of operation. That analysis (KLF-88-005) is attached for your information and will provide the basis for the 10CFR50.59 evaluation to justify extended life of these assemblies. At this time, CP&L intends to continue the use of the existing PLSAs to maintain the current flux reduction configuration at least through Cycle 13.

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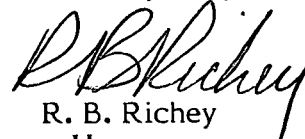
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Advanced Nuclear Fuels Company considers the information in the mechanical design report, KLF-88-005, to be proprietary. In accordance with the Commission's requirements of 10 CFR 2.790(b), the enclosed Affidavit executed by Mr. H. E. Williamson of ANF provides the necessary information to support withholding of this topical report from public disclosure.

If you have any questions concerning this matter, please contact Mr. R. W. Prunty at (919) 836-7318.

Yours very truly,



R. B. Richey
Manager

Licensing and Nuclear Fuel

RBR/MDM/che (5429MDM)

cc: Dr. J. Nelson Grace
Mr. R. Lo
Mr. L. Garner (NRC - HBR)

A F F I D A V I T

STATE OF WASHINGTON)
)
COUNTY OF BENTON) ss.

I, H. E. Williamson being duly sworn, hereby say and depose:

1. I am Manager, Licensing and Safety Engineering, for Advanced Nuclear Fuels Corporation, ("ANF"), and as such I am authorized to execute this Affidavit.

2. I am familiar with ANF's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the letter report KLF-88-005 entitled "H.B. Robinson Unit 2 Part Length Shielding Assembly Analysis," referred to as "Document." Information contained in this Document has been classified by ANF as proprietary in accordance with the control system and policies established by ANF for the control and protection of information.

4. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by ANF and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

5. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of ANF and would be helpful to competitors of ANF when competing with ANF.

7. The information contained in the Document is considered to be proprietary by ANF because it reveals certain distinguishing aspects of PWR licensing methodology which secure competitive advantage to ANF for fuel design optimization and marketability, and includes information utilized by ANF in its business which affords ANF an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it extremely valuable insights into PWR licensing methodology and would result in substantial harm to the competitive position of ANF.

9. The Document contains proprietary information which is held in confidence by ANF and is not available in public sources.

10. In accordance with ANF's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside ANF only as required and under suitable agreement providing for nondisclosure and limited use of the information.

11. ANF policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. Information in this Document provides insight into PWR licensing methodology developed by ANF. ANF has invested significant resources in developing the PWR licensing methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as ANF, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ANF.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

H. E. Williamson

SWORN TO AND SUBSCRIBED

before me this 8th day of
July, 1988.

Gloria R. Fitzgerald

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