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LEAR, G. E. PWR Project Directorate 1

SUBJECT: Forwards "Demonstration of Conformance of Exxon Nuclear Co Fuel to Westinghouse K(Z) Operating Envelope for RE Ginna Nuclear Power Plant." Analysis demonstrates that chopped cosine power shape most limiting for peak cold temp.

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December 16, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. George E. Lear, Chief
PWR Project Directorate No. 1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Demonstration of Conformance with K(z) Curve
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Lear:

An NRC letter dated April 5, 1985, "Exxon Code Error" (Reference 1) discussed four concerns the Staff had on LOCA analyses done by Exxon Nuclear Corporation (ENC). As stated in the April 5 letter, only one of the four concerns pertained to Ginna, that was the validity of applying the Westinghouse-derived K(z) curve to ENC fuel. ENC assumed that the Westinghouse-derived K(z) curve applied to the ENC fuel but additional support for this assumption was required by the NRC.

Currently, LOCA analysis for Ginna is performed by Westinghouse using the approved Westinghouse evaluation model. The analysis performed by Westinghouse bounds all fuel currently loaded at Ginna. This conclusion is supported by the analysis in Attachment A.

The attached analysis demonstrates that the chopped cosine power shape is the most limiting for peak clad temperature (PCT). Comparing the results of the attached analysis to the analysis presented in Reference 2 confirms that the Westinghouse Optimized Fuel Assembly (OFA) fuel is the most limiting based on PCT.

The attached Westinghouse analysis demonstrates that the ENC fuel in Ginna is in conformance with Section I.A. of Appendix K to 10 CFR Part 50. Specifically, an approved model has been used for evaluation of ECCS performance following a LOCA for the current fuel configuration at Ginna. This model adequately addresses a "range of power distribution shapes and peaking factors

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representing power distributions that may occur over the core lifetime". The Staff-imposed 50°F penalty for fuel-related differences is no longer required.

Very truly yours,

Roger W. Kober

Roger W. Kober

Reference 1: H.L. Thompson (NRC) to R.W. Kober (RGE) letter dated April 5, 1985, "Exxon Code Error"

Reference 2: J.E. Maier (RGE) to H.R. Denton (NRC) letter dated December 20, 1983 transmitting Application for Amendment to Technical Specifications, December 20, 1983.