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AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk) *See Rpt. Withholding*

SUBJECT: Forwards Proprietary "Evaluation of Unusual Differential Growth at Grand Gulf Unit 1," & "Insp of Siemens Power Corp Fuel Assemblies at WNP-2, May 193 (EOC 8)." *Granted 8/29/94*

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

G02-93-297
December 28, 1993

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21
GENERIC APPROVAL OF EXTENDED BURNUP FOR 8X8 FUEL**

- References:
- 1) G02-92-118, dated May 11, 1992, GC Sorensen (Supply System) to Nuclear Regulatory Commission (NRC), "Approval of Extended Burnup for 8X8 Fuel"
 - 2) Letter, dated July 1, 1992, RR Assa (NRC) to GC Sorensen (Supply System), "Proposed 8X8 Fuel Burnup Extension For Cycle 8 - WNP-2"

The Supply System is requesting generic NRC review and approval of the mechanical design analysis, provided in Reference 1, to extend the assembly exposure limits for the Siemens Power Corporation (SPC) 8X8 fuel from 35 GWD/MTU to 37 GWD/MTU. The Supply System in Reference 2 received staff approval for the exposure extension for Cycle 8. The Staff found the proposed burnup extension to 37 GWD/MTU acceptable but held further approval contingent on the Supply System commitment (in Reference 1) to monitor and resolve the differential rod growth issue.

The resolution to the 8X8 differential rod growth issue, prepared by SPC, is given in Attachment 1, Section 1, pages: 1-1 through 1-4. In summary, it states that the unusual fuel rod growth at Grand Gulf was caused by interference between the 120-mil channels and the lower tie plates of the fuel assembly due to thermal expansion. The resolution was for SPC to reduce the maximum envelope size of the lower tie plates for the Grand Gulf reactor.

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GENERIC APPROVAL OF EXTENDED BURNUP FOR 8X8 FUEL

The results of the WNP-2 fuel inspection which was performed in the 1993 Cycle 8 outage, also prepared by SPC, are given in Attachment 2, Section 5, page: 5-8. The results of this inspection establish that no unusual rod growth is present at WNP-2. These two documents fulfill the Supply System commitment to monitor and resolve the 8X8 differential rod growth issue.

Please note that the attachments referenced above and enclosed contain proprietary information. An affidavit requesting withholding from disclosure is attached.

In summary, the Supply System requests generic approval for the 8X8 extended exposure from 35 GWD/MTU to 37 GWD/MTU. The Supply System has met the commitments given in Reference 1 and will continue to complete the Cycle 10 core design, assuming that the extended burnup limits will be acceptable to the NRC. However, if it appears there may be problems with obtaining the approval, please contact the Supply System as soon as possible. Any resultant changes to the core design must be initiated prior to April 1, 1994, in order to support startup following the spring refueling outage.

Sincerely,



J. V. Parrish (1023)

Assistant Managing Director, Operations

JBM:bm

- Attachments: 1) EMF-93-014(P), dated May 1993, "Evaluation of Unusual Differential Growth at Grand Gulf Unit 1"
- 2) EMF-93-137(P), dated September 22, 1993, "Inspection of Siemens Power Corporation Fuel Assemblies at WNP-2 May 1993 (EOC 8)"

cc: JW Clifford - NRC
BH Faulkenberry - NRC RV
NRC Site Inspector - 927N
NS Reynolds - Winston & Strawn
DL Williams - BPA/399

Application for Withholding

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, D. E. Hershberger being duly sworn, hereby say and depose:

1. I am Senior Engineer, Product Licensing, for Siemens Power Corporation, ("SPC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the Washington Public Power Supply System letter to the NRC entitled "WNP-2 OPERATING LICENSE NPF-21 GENERIC APPROVAL OF EXTENDED BURNUP FOR 8X8 FUEL", and the SPC reports attached to this letter, EMF-93-014(P) entitled "Evaluation of Unusual Differential Growth at Grand Gulf Unit 1," and EMF-93-137(P) entitled "Inspection of Siemens Power Corporation Fuel Assemblies at WNP-2 May 1993 (EOC 8)," together referred to as "Document." Information contained in this Document has been classified by SPC as proprietary in accordance with policies established by SPC for the control and protection of information.

3. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by SPC 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.

4. 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.

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

6. The information contained in the Document is considered to be proprietary by SPC because it reveals certain distinguishing aspects of SPC fuel design methodology and fuel performance which secure competitive advantage to SPC for fuel design optimization and marketability, and includes information utilized by SPC in its business which affords SPC 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.

7. 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 valuable insights into SPC fuel design methodology and fuel performance and would result in substantial harm to the competitive position of SPC.

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

9. In accordance with SPC'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 SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.

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

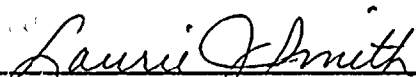
THAT the statements made hereinabove are, to the best of my knowledge, information,
and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.



SUBSCRIBED before me this 1st

day of December, 1993.



~~XXXXXX~~ Laurie J. Smith
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: ~~1/10/96~~ 11/20/94



STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Impact of Harmonics Associated
with Installation of RRC ASDs


I. J. V. PARRISH, being duly sworn, subscribe to and say that I am the Assistant Managing Director, Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

Attached to this submittal is copies of EMF-93-014, Rev. 0, and EMF-93-137, Rev. 0 which are considered by Siemens Power Corporation to contain proprietary information.

Also attached is an affidavit executed by D.E. Hershberger, Senior Engineer, Product Licensing, Siemens Power Corporation, dated December 1, 1993, which provides the basis on which it is claimed that the subject reports should be withheld from public disclosure under the provisions of 10 CFR 2.790.

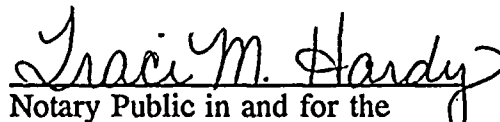
The Washington Public Power Supply System treats the subject report as proprietary information on the basis of statements by its owner. In submitting this information to the NRC, the Supply System requests that the subject report be withheld from public disclosure in accordance with 10 CFR 2.790.

DATE 27 December, 1993


J. V. Parrish, Assistant Managing Director
Operations

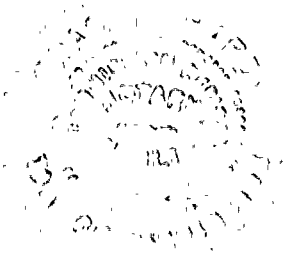
On this date personally appeared before me J. V. PARRISH, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 27th day of December 1993.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires 8/9/95





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