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 ALEXICH, M. P. Indiana & Michigan Electric Co.
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 DENTON, H. R. Document Control Branch (Document Control Desk)

SUBJECT: Forwards revised Tech Specs re extension of peak pellet exposure for Advanced Nuclear Fuel Corp fuel based on 870304 & 05 discussions & 870309 request.

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March 13, 1987
AEP:NRC:1018A

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
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PROPOSED TECHNICAL SPECIFICATION CHANGE REGARDING
EXTENSION OF PEAK PELLET EXPOSURE FOR ADVANCED
NUCLEAR FUEL CORPORATION FUEL

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555
Attention: Mr. H. R. Denton

- References: 1) Letter, M. P. Alexich (I&MECo) to U.S. Nuclear
Regulatory Commission, dated February 20, 1987
(Identifier AEP:NRC:1018)
- 2) Letter, D. L. Wigginton (NRC) to John E. Dolan
(I&MECo), dated March 9, 1987

Dear Mr. Denton:

Reference 1 transmitted proposed Technical Specification (T/S) changes regarding extension of peak pellet exposure limits for Advanced Nuclear Fuel Corporation (ANF, formerly Exxon Nuclear Company) fuel. Specifically, we proposed to modify T/Ss 3/4.2.2 (Heat Flux Hot Channel Factor - $F_Q(Z)$) and 3/4.2.6 (Axial Power Distribution) to allow an increase in peak pellet exposure for ANC fuel from its present value of 48.0 MWD/kg to 51.0 MWD/kg. In support of this proposed change, we included evaluations which justified a peak pellet exposure limit of 51.0 MWD/kg based on LOCA considerations, but only 48.7 MWD/kg based on mechanical design considerations. As discussed in our transmittal letter, it was our understanding that the additional mechanical design analyses which were needed to support the value of 51.0 MWD/kg could be reviewed by us under the provisions of 10 CFR 50.59 and thus did not require submittal to the NRC.

During discussions with the NRC staff on March 4 and 5, 1987, we were informed that the NRC staff did not accept our conclusion that the remaining analyses could be reviewed under the provisions of 10 CFR 50.59. By letter dated March 9, 1987 (Reference 2), we were requested to submit revised Technical Specifications reflecting a peak pellet exposure of 48.7 MWD/kg, since the mechanical design analyses to justify operation beyond 48.7 MWD/kg have not been completed. This letter and its attachment are responding to that request. The revised T/S pages reflecting the 48.7

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MwD/kg value are included as the attachment to this letter. Since our 10 CFR 50.92 analyses were included in our original submittal for operation up to peak pellet exposures of 48.7 MwD/kg, they will not be repeated here. Additionally, because these changes modify the original submittal, we believe that no additional fees are required per 10 CFR 170.12.

These modifications to our original proposed T/S changes have been reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and will be reviewed by the Nuclear Safety and Design Review Committee (NSDRG) at their next regularly scheduled meeting.

In compliance with the requirements of 10 CFR 50.91(b)(1), copies of this letter and its attachment have been transmitted to Mr. R. C. Callen of the Michigan Public Service Commission and Mr. G. Bruchmann of the Michigan Department of Public Health.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



M. P. Alexich
Vice President

cm

Attachment

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman
J. G. Keppler - Region III