

**GPU Nuclear Corporation**

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Writer's Direct Dial Number:

February 27, 1996
6710-96-2033

U. S. Nuclear Regulatory Commission
Att: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Core Reload Methodology

The letter transmits GPU Nuclear Topical Report TR-092, Revision 0, "TMI-1 Reload Design and Setpoint Methodology," for NRC review and approval for use in TMI-1 core reload evaluations. This is the final topical report supporting GPU Nuclear's core reload methodology. This report describes the GPU Nuclear reload design methodology applied to nuclear, thermal-hydraulic, and safety analyses, and presents setpoint methodology including safety and acceptance criteria to determine various safety limits, reactor trip setpoints and alarm limits. The individual Topical Reports for the computer codes (CASMO-3/SIMULATE-3, RETRAN-02, VIPRE-01) to be utilized as prescribed in the attached reload and setpoint methodology topical have been submitted to NRC in letters dated March 6, 1995 (C311-95-2063); March 17, 1995 (C311-95-2064); and April 25, 1995 (C311-95-2178).

The setpoint methodology has been demonstrated by comparative analyses with existing Babcock and Wilcox Fuel Company (BWFC) generated TMI-1 Cycle 10 reload design setpoints. The overall good agreement in these comparisons demonstrates GPU Nuclear's ability to perform reload design and setpoint analyses for TMI-1.

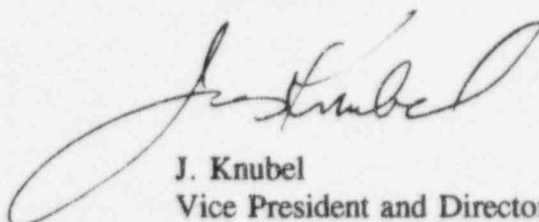
The attached GPU Nuclear Topical Report TR-092P, Revision 0, dated December 8, 1995, contains Proprietary Information as defined in 10 CFR 2.790(a)(4). Accordingly, GPU Nuclear requests that this document be withheld from public disclosure. An affidavit certifying the basis for this application for withholding as required by 10 CFR 2.790(b)(1) is also attached to this letter. A non-proprietary version of this document is also attached.

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GPU Nuclear is planning to perform the TMI-1 Cycle 12 core reload design analyses in-house to support Cycle 12 startup in October 1997. NRC review and approval of the above referenced GPU Nuclear Topical Reports describing the TMI-1 core reload methodologies is requested consistent with this schedule. GPU Nuclear is prepared to respond to any NRC review questions and to fully support the review process as necessary. If any additional information is required, please contact Mr. David J. Distel, GPU Nuclear Regulatory Affairs at (201 316-7955.

Sincerely,



J. Knubel
Vice President and Director, TMI

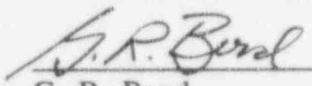
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- Attachments:
1. GPU Nuclear Affidavit Certifying Request for Withholding from Public Disclosure
 2. GPU Nuclear Topical Report 092P, Revision 0 - Proprietary Version (Enclosure 15 copies to NRC)
 3. GPU Nuclear Topical Report 092, Revision 0 - Non-Proprietary Version (Enclosure 15 copies to NRC)
- c: Administrator, Region I, w/Non-Proprietary Report
U. S. NRC TMI-1 Senior Resident Inspector, w/Non-Proprietary Report
U. S. NRC Senior Project Manager, TMI-1, w/Proprietary Report

ATTACHMENT 1

AFFIDAVIT OF G. R. BOND

1. I am Director, Nuclear Analysis and Fuel, GPU Nuclear Corporation ("GPUN"), and as such have the responsibility of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear plant licensing, and am authorized to apply for its withholding on behalf of GPUN.
2. I am making this affidavit in conformance with the provisions of 10 CFR 2.790 of the regulations of the Nuclear Regulatory Commission ("NRC") and in conjunction with GPUN's application for withholding which accompanies this affidavit.
3. I have knowledge of the criteria used by GPUN in designating information as proprietary or confidential.
4. Pursuant to the provisions of paragraph (b)(4) of 10 CFR 2.790, the following is furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is either owned by GPUN or is information owned by Babcock & Wilcox Fuel Company for which GPUN is contractually obligated to protect from public disclosure, and has been held in confidence by GPUN and its consultants.
 - (ii) The information is of a type that would customarily be held in confidence by GPUN, portions of which GPUN is contractually obligated to protect from public disclosure. The information consists of analysis methodology details, analysis results, supporting data, and aspects of development programs, relative to a method of analysis that provides a competitive advantage to GPUN.
 - (iii) The information is transmitted to the NRC in confidence and under the provisions of 10 CFR 2.790, it is to be received in confidence by the NRC.
 - (iv) The information sought to be protected is not available in public to the best of our knowledge and belief.
 - (v) The proprietary information sought to be withheld is that which is contained in the proprietary version of the attached Topical Report TR-092P, Revision 0, dated December 8, 1995, "TMI-1 Reload Design and Setpoint Methodology", as indicated and omitted from the non-proprietary version.

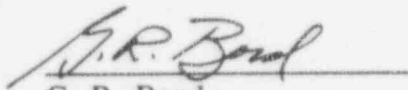

G. R. Bond

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AFFIDAVIT OF G. R. BOND (Page 2)

This information enables GPUN to:

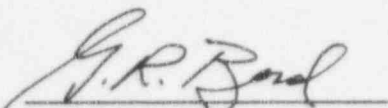
- (a) Respond to Generic Letter 83-11, "Licensee Qualification for Performing Safety Analyses in Support of Licensing Actions."
 - (b) Respond to NRC requests for information regarding the transient response of Babcock & Wilcox pressurized water reactors.
 - (c) Support license amendment and Technical Specification revision requests for Babcock & Wilcox PWRs.
 - (d) Perform safety reviews per 10 CFR 50.59
 - (e) Enhance operation of and training programs related to nuclear power plants.
- (vi) The proprietary information sought to be withheld from public disclosure has substantial commercial value to GPUN.
- (a) It allows GPUN to reduce vendor and consultant expenses associated with supporting the operation and licensing of nuclear power plants.
 - (b) GPUN intends to sell the information to nuclear utilities, vendors, and consultants for the purpose of supporting the operating and licensing of nuclear power plants.
 - (c) The subject information could only be duplicated by competitors at similar expense to that incurred by GPUN.
5. Public disclosure of this information is likely to cause harm to GPUN because it would allow competitors in the nuclear industry to benefit from the results of a significant development program without requiring a commensurate expense or allowing GPUN to recoup a portion of its expenditures or benefit from the sale of the information.


G. R. Bond

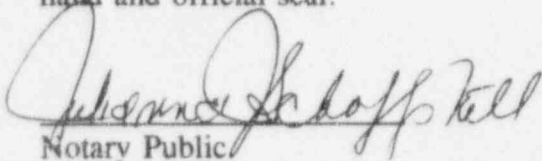
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AFFIDAVIT OF G. R. BOND (Page 3)

G. R. Bond, being duly sworn, on his oath deposes and says that he is the person who subscribed his name to the foregoing statement, and that the matters and facts set forth in the statement are true.


G. R. Bond

Sworn to and subscribed before me this 30 day of JAN, 1996. Witness my hand and official seal.


Notary Public

JULIENNE J. SCHOFFSTALL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 24, 1997

My commission expires _____.