



ARKANSAS POWER & LIGHT COMPANY

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July 11, 1985

2CANØ785Ø6

Director of Nuclear Reactor Regulation
ATTN: Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
ANO-2 Shoulder Gap Inspection
Results for 2R4 - CEN-309(A)

Gentlemen:

Per our letter dated January 4, 1985 (2CANØ185Ø1), we are transmitting the attached Combustion Engineering (CE) report CEN-309(A), "ANO-2 Cycle 5 Shoulder Gap Evaluation", which is an evaluation of the results of the ANO-2 fuel assembly shoulder gap measurements performed during the 2R4 refueling outage.

A preliminary analysis of the results showed that shoulder gap closure would not occur in Cycle 5; this information was transmitted verbally to the NRC on April 12, 1985 by conference call with Mr. Dale Powers of Region IV and the ANO-2 Project Manager, and was documented by our letter dated April 17, 1985 (2CANØ485Ø5). This submittal of CEN-309(A) also satisfies our commitment to transmit the written report within 45 days after the 2R4 outage, which ended on May 27, 1985.

The analyses contained in the attached report support Cycle 5 operation and further show that shoulder gap closure in the current fuel design (Batch F and G) will not occur before fast fluence exposures of 11.6×10^{21} nvt ($E > 0.821$ MeV). This fluence corresponds approximately to a rod burnup of 56,000 MWD/MTU. Our current plans for the Cycle 6 core composition are to use all assemblies of the current design, with the possible exception of the center one, which may be a DOE high-burnup test assembly. The maximum planned total exposure for any of the current design assemblies at the end of Cycle 6 is 45,000 MWD/MTU. Therefore, shoulder gap examinations at the end of Cycle 5 of the current design assemblies should be unnecessary. Selection of the center assembly has not yet been finalized, but the adequacy of its shoulder gap for Cycle 6 operation will be assured by analyses or measurement.

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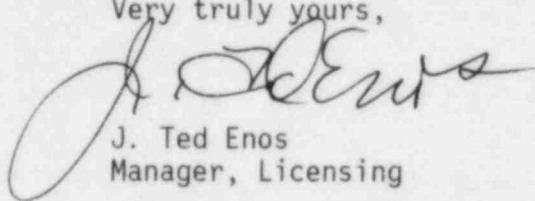
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July 11, 1985

CE has determined that certain portions of the attached document are proprietary in nature and requests that they be withheld from public disclosure per the provisions of 10CFR2.790. An affidavit to support this determination is also attached. To support this request, five proprietary (CEN-309(A)-P, numbered 000001 through 000005) and five non-proprietary (CEN-309(A)-NP) copies are provided.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. Ted Enos", is written over the typed name and title.

J. Ted Enos
Manager, Licensing

JTE:RBT

Attachment

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, S. T. Brewer, depose and say that I am the Senior Vice President, Nuclear Power Systems, of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Arkansas Power & Light Company for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN-309(A)-P, Arkansas Nuclear One, Unit 2 Cycle 5 Shoulder Gap Evaluation, July 1985.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure are shoulder gap and guide tube length change measurements and subsequent evaluations, which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject document herein is proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactor competitors of Combustion Engineering.

b. Development of this information by C-E required hundreds of manhours and tens of thousands of dollars. To the best of my knowledge and belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience to obtain the shoulder gap and guide tube length change measurements and subsequent evaluations.

d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

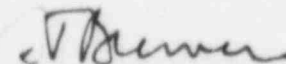
e. The information consists of shoulder gap and guide tube length change measurements and subsequent evaluations, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Combustion Engineering's competitors to utilize such information

without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

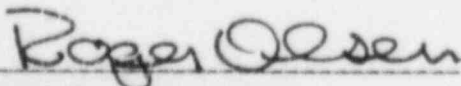
Further the deponent sayeth not.



S. T. Brewer
Senior Vice President
Nuclear Power Systems

Sworn to before me

this 10th day of July, 1985



Justice of the Peace
ROGER L. OLSEN
JUSTICE OF THE PEACE
336 TAYLOR ROAD
ENFIELD, CT 06082

TERM EXPIRES: 1/2/89