



November 6, 1996
JHT/96-74

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-001

Subject: Application of BAW-10186P

Reference: Letter (JHT/92-259) to NRC Document Control Desk from J. H. Taylor (BWNT), dated November 24, 1992, Subject: Submittal of Topical Report BAW-10186P, "Extended Burnup Evaluation, November 1992."

Gentlemen:

Framatome Cogema Fuels (FCF) will observe the following limitations in the application of the approved methodology of the reference topical, BAW-10186P for extended burnup applications:

1. FCF Fuel Burnup Limits - For all FCF fuel designs FCF will limit the maximum fuel rod burnup to the licensed burnup limit until such time as additional data at extended burnup is obtained and submitted to the NRC for review and approval.
2. Cladding Corrosion Limit - Cladding corrosion will be predicted using the COROS02 code, as described in the reference topical report. Fuel cycle designs will be limited such that the predicted oxide thickness will be no greater than the licensed limit until such time as additional data is submitted to the NRC for review and approval demonstrating that sufficient cladding ductility remains at higher oxide levels.

The attachment to this letter contains additional detail concerning FCF's commitments related to extended burnup. In accordance with the provisions of 10CFR2.790, FCF considers the information in the attachment to be proprietary and requests that it be withheld from public disclosure. An affidavit supporting this request, signed by J. H. Taylor, Manager, Licensing Services was included with the November 24, 1992 submittal of BAW-10186P.

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Some of the B&W designed reactors are currently approaching licensed burnup limits. In order to avoid exceeding the limits, approval of BAW-10186P is needed by December 31, 1996.

Very truly yours,

C. F. McPhatter
for

James H. Taylor, Manager
Licensing Services

cc: L. E. Phillips/NRC
S. L. Wu/NRC
R. C. Jones/NRC
R. B. Borsum/FTI-MD82