



FRAMATOME ANP

An AREVA and Siemens company

FRAMATOME ANP, Inc.

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NRC:02:041

Document Control Desk
ATTN: Chief, Planning, Program and Management Support Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Clarification of Exposure Limit Applicable to Framatome ANP BWR Fuel

Ref.: 1. Letter from J. F. Mallay (Framatome ANP) to Document Control (NRC),
"Clarification of Exposure Limit Applicable to Framatome ANP BWR Fuel,"
NRC:02:029, June 27, 2002.

A letter was sent by Framatome ANP (Reference 1) to request NRC concurrence with the position that it is not necessary to apply a specific exposure limit to part length fuel rods. This conclusion was based, in part, on the fact that the exposures in the part length fuel rod are similar to and, in most cases, less than the exposures in the full length fuel rod.

The letter also states, "The part length fuel rod is not a limiting rod from any of the mechanical or safety analysis criteria." Framatome ANP has performed additional analyses on part length fuel rods and has identified situations in which the part length fuel rods may be limiting. In particular, recent analyses demonstrate that part length fuel rods may be limiting for the internal rod pressure criterion. This situation does not alter our original position, however.

Part length fuel rods are analyzed as part of the normal reload analysis, and the results are compared to the same criteria as the full length rods and are shown to comply with the criteria. Framatome ANP will continue to analyze both full and part length fuel rods against the required criteria and will demonstrate that all rods, including part length rods, meet the criteria.

Even though a part length fuel rod may be the limiting rod, Framatome believes it is sufficient to demonstrate that all rods meet the required criteria. Therefore, consistent with the Reference 1 letter, Framatome ANP requests NRC concurrence that an exposure limit for the methodology applied to the part length fuel rod is not required. A response will be appreciated by October 30, 2002.

Very truly yours,

James F. Mallay, Director
Regulatory Affairs

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Project 693

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