

NRC-03-032

10 CFR 50.90

March 21, 2003

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

KEWAUNEE NUCLEAR POWER PLANT
DOCKET 50-305
LICENSE No. DPR-43
LICENSE AMENDMENT REQUEST 187 TO THE KEWAUNEE NUCLEAR POWER PLANT
TECHNICAL SPECIFICATIONS, CONFIRMATION OF USE OF WCAP-12488, ADDENDUM 2
(TAC NO. MB5718).

Reference Letter from Mark E. Warner (NMC) to Document Control Desk (NRC), "License Amendment Request 187 to the Kewaunee Nuclear Power Plant Technical Specifications, Conforming Technical Specification Changes for Use of Westinghouse VANTAGE+ Fuel," dated July 26, 2002.

The Nuclear Management Company (NMC) in accordance with 10 CFR 50.90 requested to amend Facility Operating License DRP-43 for Kewaunee Nuclear Power Plant. The purpose of this license amendment request (LAR) was to implement the changes necessary to accommodate Westinghouse 422 VANTAGE + nuclear fuel with PERFORMANCE + features (422V+).

In the NMC submittal (referenced letter) NMC made the statement that as discussed in the Westinghouse report, fuel rod evaluations for the 422V+ fuel were performed using NRC approved models and methods to demonstrate that all fuel rod design criteria are satisfied and documented. One analysis, however, remained to be completed. Westinghouse has forwarded the NRC WCAP-12488, Addendum 2 for review and approval. Following NRC approval of Addendum 2, the stress values were to be re-evaluated to confirm that the proposed clad stress criterion is met. Thus the NMC made the following commitment:

Upon NRC approval of WCAP 12488, Addendum 2, "Revision to Design Criteria," confirmation of meeting the criterion will be submitted.

Prior to the NRC staff's approval of WCAP 12488, Addendum 2, "Revision to Design Criteria," the NRC and Westinghouse had discussions on the WCAP 12488, Addendum 2, and it was agreed to renumber the report as WCAP-10125-P Addendum 1, "Revision to Design Criteria" without change, at the request of the NRC.

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Subsequently, Westinghouse has re-evaluated the stress values using WCAP-10125-P Addendum 1, "Revision to Design Criteria," and confirmed that the proposed clad stress criterion is met. This letter fulfills the NMC commitment to confirm to the NRC that the clad stress criterion has been evaluated with the methodology in WCAP-10125-P, A1 (formerly WCAP-12488, A2) and has been shown to meet the applicable limits.

Although NMC's commitment was to perform a re-evaluation after NRC approval of WCAP 10125, Addendum 1, this re-evaluation has been performed prior to NRC approval of WCAP 10125, Addendum 1. The timing of the re-evaluation was discussed and deemed acceptable in a telecom between Mr. Gerald Riste (NMC) and Mr. John Lamb (NRC).

I declare under penalty of perjury that the foregoing is true and correct.
Executed on March 21, 2003.



Thomas Coutu
Site Vice-President, Kewaunee Plant

GOR

cc- US NRC, Region III
US NRC Senior Resident Inspector
Electric Division, PSCW