

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 12, 2008

Vice President, Operations Entergy Nuclear Operations Palisades Nuclear Plant 27780 Blue Star Memorial Highway Covert, MI 49043-9530

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: REQUEST TO

SUPPORT USE OF M5 ALLOY (TAC NO. MD8024)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 234 to Renewed Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated January 31, 2008, as supplemented by letter dated July 30, 2008.

The amendment revises the description of fuel assemblies specified in Technical Specification (TS) 4.2.1 and adds the approved AREVA licensed topical report BAW-10240(P) - A, "Incorporation of M5 Properties in Framatome ANP Approved Methods," to the analytical methods referenced in TS 5.6.5.b to permit the use of M5 alloy and supporting analytical methods in future reload designs.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely.

Mahesh L. Chawla, Project Manager

Plant Licensing Branch III-1

Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures:

1. Amendment No. 234 to DPR-20

2. Safety Evaluation

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 234 License No. DPR-20

- 1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Nuclear Operations, Inc. (the licensee), dated January 31, 2008, as supplemented by letter dated July 30, 2008, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C. (2) of Renewed Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 234, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Entergy Nuclear Operations shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Lois M. James, Chief

Plant Licensing Branch III-1

Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility Operating License

and Technical Specifications

Date of Issuance: December 12, 2008

ATTACHMENT TO LICENSE AMENDMENT NO. 234

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following page of the Renewed Facility Operating License No. DPR-20 with the attached revised page. The changed area is identified by a marginal line.

<u>REMOVE</u>	<u>INSERT</u>
Page 3	Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	<u>INSERT</u>
4.0-1	4.0-1
5.0-27	5.0-27

- (1) Pursuant to Section 104b of the Act, as amended, and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," (a) ENP to possess and use, and (b) ENO to possess, use and operate, the facility as a utilization facility at the designated location in Van Buren County, Michigan, in accordance with the procedures and limitation set forth in this license;
- (2) ENO, pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use source and special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Updated Final Safety Analysis Report, as supplemented and amended;
- (3) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use byproduct, source, and special nuclear material as sealed sources for reactor startup, reactor instrumentation, radiation monitoring equipment calibration, and fission detectors in amounts as required;
- (4) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material for sample analysis or instrument calibration, or associated with radioactive apparatus or components; and
- (5) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operations of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
 - (1) ENO is authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.
 - (2) The Technical Specifications contained in Appendix A, as revised through Amendment No. 234, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. ENO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - (3) ENO shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SERs dated 09/01/78, 03/19/80, 02/10/81, 05/26/83, 07/12/85, 01/29/86, 12/03/87, and 05/19/89 and subject to the following provisions:

Renewed License No. DPR-20 Amendment No. 234

4.1 Site Location

The Palisades Nuclear Plant is located on property owned by Entergy Nuclear Palisades, LLC on the eastern shore of Lake Michigan approximately four and one-half miles south of the southern city limits of South Haven, Michigan. The minimum distance to the boundary of the exclusion area as defined in 10 CFR 100.3 shall be 677 meters.

4.2 Reactor Core

4.2.1 Fuel Assemblies

The reactor core shall contain 204 fuel assemblies. Each assembly shall consist of a matrix of zircaloy-4 or M5 clad fuel rods with an initial composition of depleted, natural, or slightly enriched uranium dioxide (UO_2) as fuel material. Limited substitutions of zirconium alloy or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions. A core plug or plugs may be used to replace one or more fuel assemblies subject to the analysis of the resulting power distribution. Poison may be placed in the fuel bundles for long-term reactivity control.

4.2.2 Control Rod Assemblies

The reactor core shall contain 45 control rods. Four of these control rods may consist of part-length absorbers. The control material shall be silver-indium-cadmium, as approved by the NRC.

4.3 Fuel Storage

4.3.1 <u>Criticality</u>

- 4.3.1.1 The Region I fuel storage racks (See Figure B 3.7.16-1) are designed and shall be maintained with:
 - a. Fuel assemblies having a maximum planar average U-235 enrichment of 4.95 weight percent;

5.6 Reporting Requirements

5.6.5 <u>COLR</u> (continued)

- 14. EMF-92-116(P)(A), "Generic Mechanical Design Criteria for PWR Fuel Designs," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 15. EMF-2087(P)(A), "SEM/PWR-98: ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, & 3.2.2)
- 16. ANF-87-150 Volume 2, "Palisades Modified Reactor Protection System Report: Analysis of Chapter 15 Events," Advanced Nuclear Fuels Corporation. [Approved for use in the Palisades design during the NRC review of license Amendment 118, November 15, 1988] (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.4.1)
- 17. EMF-1961(P)(A), Revision 0, Siemens Power Corporation, July 2000, "Statistical Setpoint/Transient Methodology for Combustion Engineering Type Reactors." (LCOs 3.1.6, 3.2.1, 3.2.2, 3.2.4, & 3.4.1)
- 18. EMF-2328 (P)(A), Revision 0, Framatome ANP, Inc., March 2001, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based." (LCOs 3.1.6, 3.2.1, & 3.2.2)
- 19. BAW-2489P, "Revised Fuel Assembly Growth Correlation for Palisades." (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 20. EMF-2103(P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, & 3.2.2)
- 21. BAW-10240(P)-A, "Incorporation of M5 Properties in Framatome ANP Approved Methods." (LCOs 3.1.6, 3.2.1, 3.2.2, 3.2.4, & 3.4.1)
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid cycle revisions or supplements, shall be provided, upon issuance for each reload cycle, to the NRC.



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 205555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 234 TO RENEWED

FACILITY OPERATING LICENSE NO. DPR-20

ENTERGY NUCLEAR OPERATIONS, INC.

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated January 31, 2008, (Reference 1), as supplemented by letter dated July 30, 2008 (Reference 2), Entergy Nuclear Operations Inc. (Entergy), the licensee, submitted a request for a license amendment to support the use of M5 alloy for fuel rod cladding and fuel assembly structural components in future operating cycles at Palisades Nuclear Plant (PNP). Pursuant to 10 CFR 50.90, Entergy proposes to revise the description of fuel assemblies specified in Technical Specification (TS) 4.2.1 and add the approved AREVA licensed topical report BAW-10240(P)-A (Reference 3), "Incorporation of M5 Properties in Framatome ANP Approved Methods," to the analytical methods referenced in TS 5.6.5.b to permit the use of M5 alloy and supporting analytical methods in future reload designs. The supplement dated July 30, 2008, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on March 25, 2008 (73 FR 15786).

2.0 REGULATORY EVALUATION

The license amendment request involves modifying the fuel assembly description within TS 4.2.1 and adding new analytical methods to TS 5.6.5. The proposed TS changes will be evaluated to ensure continued compliance with requirements of 10 CFR 50.36(c)(2)(ii), listed below.

- (ii) A technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:
 - (A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
 - (B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

- (C) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- (D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

Compliance with this regulation requires a licensee to maintain a list of approved analytical methods used to establish potentially cycle-specific core operating limits, per Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications." The staff's review will verify that the new analytical methods are applicable to the licensee and will be used in accordance with established conditions and limitations.

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50.46, "Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors," requires that the calculated emergency core cooling system (ECCS) performance for reactors with zircaloy or ZIRLO fuel cladding meet certain criteria. Appendix K to 10 CFR Part 50, "ECCS Evaluation Models," presumes the use of zircaloy or ZIRLO fuel cladding when doing calculations for energy release, cladding oxidation, and hydrogen generation after a postulated loss-of-coolant accident. On October 16, 2006, NRC granted an exemption to Palisades from the requirements of 10CFR Part 50, section 50.46, and Appendix K to 10CFR Part 50 for use of M5 Fuel Cladding (ADAMS Accession No. ML062560179).

As stated in Palisades UFSAR, Revision 27, section 1.8.1.1, construction permits for Palisades were issued prior to issuance of the final General Design Criteria (GDC) (10 CFR 50 Appendix A), the associated Standard Review Plans (NUREG 75/087 and 0800), and other guidance documents. Regulatory guidance for the review of fuel rod cladding materials and fuel system designs and adherence to GDC 2, 10, 27, and 35, is provided in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (SRP), Revision 3, March 2007, Section 4.2, "Fuel System Design." In accordance with SRP Section 4.2, the objectives of the fuel system safety review are to provide assurance that:

- The fuel system is not damaged as a result of normal operation and anticipated operational occurrences.
- Fuel system damage is never so severe as to prevent control rod insertion when it is required.
- The number of fuel rod failures is not underestimated for postulated accidents.
- Coolability is always maintained.

In addition to licensed reload methodologies, an approved mechanical design methodology is utilized to demonstrate compliance with SRP 4.2 fuel design criteria. The staff has previously reviewed and approved the AREVA suite of analytical models and methods which reflect M5 alloy material and mechanical properties. AREVA licensed topical report BAW-10240(P)-A (Reference 3), "Incorporation of M5 Properties in Framatome ANP Approved Methods," provides an approved reload design methodology supporting the use of M5 alloy as fuel rod cladding and assembly structural components. The staff's safety evaluation (SE) for BAW-10240(P)-A states:

The staff has found that BAW-10240(P) is acceptable for referencing in licensing applications for Westinghouse and Combustion Engineering designed pressurized-water reactors to the extent specified and under the limitations delineated in the TR and in the enclosed SE.

As a Combustion Engineering designed pressurized-water reactor, BAW-10240(P)-A is applicable to PNP. In response to a request for additional information (RAI) regarding conditions and limitations within BAW-10240(P)-A (RAI #3, Reference 2), Entergy stated that PNP will comply with the four conditions specified in BAW-10240(P)-A.

Based upon a review of the staff's prior approval and Entergy's future compliance with the staff's conditions of approval, the staff finds the application of BAW-10240(P)-A to PNP acceptable.

3.0 TECHNICAL EVALUATION

Entergy proposes to revise the description of fuel assemblies specified in TS 4.2.1 and add the approved AREVA licensed topical report BAW-10240(P)-A (Reference 3), "Incorporation of M5 Properties in Framatome ANP Approved Methods," to the analytical methods referenced in TS 5.6.5.b in order to permit the use of M5 alloy and supporting analytical methods in future reload designs.

TS 4.2.1 Fuel Assemblies

PNP TS 4.2.1 "Fuel Assemblies" provides a brief description of the reactor core and fuel assembly design. A markup of the proposed change to TS 4.2.1 is provided in Enclosure 3 of Reference 1. The text "or M5" is being added as an optional fuel rod cladding material (in addition to existing Zircaloy-4 cladding).

A more detailed description of the current PNP fuel assembly design is provided in updated final safety analysis report (UFSAR) Table 3-2. In response to an RAI regarding the extent of change to the fuel assembly design being proposed (RAI #1, Reference 2), Entergy provided markup of UFSAR Table 3-2. Examination of the markup reveals limited design changes relative to the current fuel assemblies, including optional M5 instrument tubes and optional M5 fuel rod cladding. The staff noted that the Table 3-2 markup specified "Zr-4 or M5 tube, cold worked and stress relieved." This markup is incorrect. AREVA M5 alloy is fully recrystallized (as opposed to cold worked and stress relieved). This was communicated to the licensee and the licensee plans to correct this typographical error as part of the periodic UFSAR update.

Recent plant operating experience has proven that M5 guide tubes may experience unanticipated growth. In response to an RAI regarding M5 growth (RAI #2, Reference 2), Entergy provided the Palisades growth correlation (BAW-2489P) along with their strategy for evaluating M5 guidebar growth. Entergy is delaying implementation of M5 guidebars (PNP fuel designs do not have guide tubes) until the AREAV M5 fuel assembly growth issues are resolved. As stated in this response, Cycle 21 fuel designs will maintain the current Zircaloy-4 guidebars. However, operating cycles after Cycle 21 may use M5 guidebars. Entergy states that the assembly growth correlation will be reviewed to ensure its continued applicability prior to implementation of M5 guidebars. In the absence of lead test assemblies in-reactor experience with M5 guidebars, it may be difficult to correlate M5 guidebar growth to M5 guide tube growth. Since no information was provided on the potential growth of M5 guidebars, the staff's review is limited to assembly designs with Zircaloy-4 guidebars.

AREVA's M5 alloy was first approved for fuel rod cladding and assembly structural components in BAW-10227(P)-A (Reference 4). Since its approval, thousands of fuel rods with M5 cladding have successfully operated within Westinghouse. Babcock & Wilcox, and Combustion

Engineering designed reactors. Based upon this in-reactor operating experience, there is no reason to believe that the future performance of M5 fuel cladding at PNP would not be acceptable.

The underlying purpose of 10 CFR 50.46 is to establish acceptance criteria for emergency core cooling system (ECCS) performance. The staff's review and approval of topical report BAW-10227P-A (Reference 4) addressed all of the important aspects of M5 with respect to ECCS Performance Requirements: (1) applicability of 10 CFR 50.46(b) fuel acceptance criteria, (2) M5 material properties including fuel rod ballooning and rupture strains, and (3) steam oxidation kinetics and applicability of Baker-Just weight gain correlation. A subsequent U.S. Nuclear Regulatory (NRC)-approved topical report, BAW-10240(P)-A (Reference 3), further addressed M5 material properties with respect to loss-of-coolant (LOCA) applications. Based on an ongoing LOCA research program at Argonne National Laboratory (ANL) (Reference 5), cladding corrosion (and associated hydrogen pickup) has a significant impact on post-quench ductility. Pre-test characterization of irradiated M5 fuel cladding segments at ANL provide further evidence of favorable corrosion and hydrogen pickup characteristics of M5 as compared with standard Zircaloy-4. Hence, the M5 fuel rods would be less susceptible to the detrimental effects of hydrogen uptake during normal operation and their impact on post-quench ductility. Furthermore, ANL post-quench ductility tests on un-irradiated and irradiated M5 cladding segments demonstrate that the 50.46(b) fuel criteria (i.e., 2200 °F and 17 percent equivalent cladding reacted limit) remain conservative up to current burnup limits.

Based on the above evaluation, the staff finds the proposed TS change to be acceptable.

TS 5.6.5 Core Operating Limits Report (COLR)

PNP TS 5.6.5 provides a list of approved analytical methods used to establish potentially cycle-specific core operating limits. The proposed change adds the approved topical report BAW-10240(P)-A to support the use of M5 alloy. Section 2 (above) documents that the new analytical methods are applicable to the licensee and will be used in accordance with established conditions and limitations. The proposed changes to TS 5.6.5 maintain compliance with the requirements of 10 CFR 50.36(c)(2)(ii) and are therefore acceptable.

The staff has previously reviewed and approved the use of M5 alloy for fuel rod cladding and assembly structural components (along with an approved application methodology). Based upon this prior approval, its applicability to PNP and future use in accordance with established conditions and limitations, and favorable operating experience, the staff finds the use of M5 at PNP along with the proposed TS changes acceptable.

The staff recognizes that implementing M5 alloy and the supporting analytical models and methods may change the numerical value for any given core operating limit. However, the license amendment does not change the requirement that these operating limits be maintained within the COLR and be determined/confirmed using the NRC-approved methods listed in TS 5.6.5.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The Michigan State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or change the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (73 FR 15786). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c) (9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The staff has reviewed the licensee's requests to amend TS 4.2.1 and TS 5.6.5 for use of M5 alloy for fuel rod cladding and assembly components at Palisades Nuclear Plant. Based on the staff evaluation, as set forth above, the staff concludes that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

- 1. Letter from C. Schwarz (Entergy) to U.S. Nuclear Regulatory Commission, "License Amendment Request to Support Use of M5 Alloy," Docket No. 50-255, January 31, 2008, Agencywide Documents Access and Management System (ADAMS) Accession No. ML080320284.
- Letter from C. Schwarz (Entergy) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Regarding License Amendment Request to Support Use of M5 Alloy," Docket No. 50-255, July 30, 2008, ADAMS Accession No. ML082130155.
- 3. BAW-10240(P)-A, "Incorporation of M5 Properties in Framatome ANP Approved Methods," May 2004.
- 4. BAW-10227(P)-A, "Evaluation of Advanced Cladding and Structural Material (M5) in PWR Reactor Fuel," February 2000.
- 5. NRC Memorandum, "Research Information Letter 0801, "Technical Basis for Revision of Embrittlement Criteria in 10 CFR 50.46," May 30, 2008, ADAMS Accession No. ML0813502251.

Principal Contributor: Paul Clifford

Date: December 12, 2008

December 12, 2008

Vice President, Operations **Entergy Nuclear Operations** Palisades Nuclear Plant 27780 Blue Star Memorial Highway Covert, MI 49043-9530

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: REQUEST TO

SUPPORT USE OF M5 ALLOY (TAC NO. MD8024)

Dear Sir or Madam:

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A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager Plant Licensing Branch III-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures:

1. Amendment No. 234 to DPR-20

2. Safety Evaluation

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