

William J. Cahill, Jr.
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N Y 10003
Telephone (212) 460-3819

February 26, 1980

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

On February 11, 1980 the Commission issued a Confirmatory Order for the Indian Point Unit 2 facility. This Order modified certain commitments made by Con Edison in a February 1, 1980 letter to you. Con Edison shall proceed in accordance with the Commission's Order which is considered to have superseded the commitments made in the February 1, 1980 letter.

It is also our understanding that 30 day Order requirements are to be completed by March 12; the 60 day requirements by April 11; the 90 day requirements by May 11; the 120 day requirements by June 10; and, the six month requirements by August 11, 1980.

Very truly yours,



William J. Cahill, Jr.
Vice President

cc: Mr. T. Rebelowski, Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

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FEBRUARY 25 1980

Docket No. 50-247

Mr. William J. Cahill, Jr.
Vice President
Consolidated Edison Company
of New York, Inc.
4 Irving Place
New York, New York 10003

Dear Mr. Cahill:

During the last several years, data have begun to indicate that the fission gas release rate from LWR fuel pellets is increased (enhanced) with burnup. Many of the current fuel performance analyses do not consider the impact of burnup-enhanced release on safety. By letters dated November 23, 1976, the NRC staff requested all LWR licensees to assess the higher fission gas release for fuel burnups above 20,000 Megawatt-day per metric ton (MWD/t).

Also, by NRC staff letter dated January 18, 1978, all U. S. LWR fuel suppliers were requested to revise their fuel performance analyses to include the enhancement of fission gas release at higher burnups.

All responses to the November 23, 1976 letters have been reviewed. We have concluded that no immediate licensing action is required for operating reactors. This conclusion is valid for typical reported LWR fuel bundle and batch burnups. Any extension of these burnups or other factors which significantly affect fission gas release, LOCA PCT or fuel rod internal pressure is outside the scope of the conclusion.

Westinghouse was the only fuel supplier calculating that the increased release would cause internal fuel rod pressure to exceed coolant system pressure. The staff has approved revised design criteria which allow internal rod pressures greater than system pressure. The staff is also completing the review of a Westinghouse revised fuel performance code. The staff, in evaluating reloads, has been requesting licensees using Westinghouse fuel to quantify the burnup when the newly approved design criteria will be violated. In the reloads evaluated thus far, there appears to be a significant burnup margin to the newly approved evaluated design criteria to compensate for modifications which may result from the staff's review of the Westinghouse revised fuel performance code.

Inasmuch as you and/or the staff will be evaluating all future reloads against fuel vendors' revised fuel performance codes which provide for increase in fission gas release at higher burnups, we consider this a satisfactory resolution of this concern.

Sincerely,

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OFFICE	DOR-ORB#1:C	Original Signed By	A. Schwencer, Chief
BURNNAME	ASchwencer:pab		
DATE	2/27/80		