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TO: Mr. Oland D. Parr

FROM: TVA
Chattanooga, Tenn. 37401
J. E. Gilleland

DATE OF DOCUMENT
09/06/77

DATE RECEIVED
09/12/77

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DESCRIPTION *RE: The 2 HRS 6:30 + 10-5-76*
Furnishing information concerning
conduction of a fuel surveillance program at
both Bellefonte units and asking reconsideration
that TVA conduct the fuel surveillance program at
both units if they are the first two units to use
the new fuel...

2p

PLANT NAME: BELLEFONTE UNITS 1 & 2
jcm 09/12/77

ENCLOSURE

DO NOT REMOVE

ACKNOWLEDGED

FOR ACTION/INFORMATION

ASSIGNED AD: (LTR)	VASSALLO
BRANCH CHIEF:	PARR
PROJECT MANAGER:	PIKE
LICENSING ASST: (LTR)	RUSHBROOK

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830 Power Building
TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

SEP 6 1977

Regulatory

File Cy-



Director of Nuclear Reactor Regulation
Attention: Mr. Olan D. Parr, Chief
Light Water Reactors, Branch No. 3
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Parr:

In the Matter of the Application of) Docket Nos. 50-438
Tennessee Valley Authority) 50-439

My letters dated June 30 and October 5, 1976, stated that TVA would conduct a fuel surveillance program at the Bellefonte Nuclear Plant if it was the first to utilize the Babcock & Wilcox (B&W) Mark C 17 x 17 fuel. Your letter to Godwin Willams, Jr., dated November 2, 1976, stated that you "will require that TVA commit to an NRC approved fuel surveillance program for both Bellefonte units if they are the first two units or either unit that is among the first two units to use the new Mark C 17 x 17 fuel." It is our position that this requirement imposes an unnecessary burden on TVA.

The strong dependence of fuel behavior upon plant operating philosophy, power generating history, and water chemistry would indicate that different utilities should be chosen for any specific fuel surveillance program required on two or more units. Such action provides assurance that anomalous fuel behavior, should any occur, is not tied to a particular utility dependent operational characteristic. The projected fuel load dates for the first several units to use the Mark C fuel are not so far apart that a significant schedular benefit would result from requiring that the special surveillance program be conducted on both Bellefonte units if they are the first two to utilize the Mark C 17 x 17 fuel.

As you are aware, B&W is conducting an extensive Mark C 17 x 17 demonstration program which includes the insertion of Mark C fuel assemblies into at least one unit at the Oconee Nuclear Plant. This program should provide early verification of the adequacy of the Mark C fuel design.

Your plans to include the fuel surveillance requirement in Regulatory Guide 1.70 and the Standard Review Plan will also provide additional verification of the adequacy of the fuel design on all units using Mark C fuel.

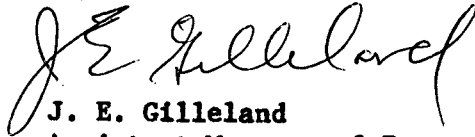
Mr. Olan D. Parr

SEP 6 1977

For the aforementioned reasons, we reaffirm our commitment, as stated in my June 30 and October 5, 1976, letters, that TVA would conduct a fuel surveillance program at one Bellefonte unit if it is one of the first two units to use the new Mark C 17 x 17 fuel.

We would appreciate your reconsidering your position that TVA conduct the fuel surveillance program at both units if they are the first two units to use the new fuel.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. E. Gilleland".

J. E. Gilleland
Assistant Manager of Power