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WISCONSIN PUBLIC SERVICE CORPORATION





Division of Operating Plantors Office of Nuclear Reactors Regulation U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Mr. R. A. Purple, Chief Operating Reactors Branch #1

Gentlemen:

Subject: Docket 50-305 Operating License DPR-43 ECCS Evaluation P.O. Box 1200, Green Bay, Wisconsin 54305

February 10, 1976



On January 26, 1976, we were informed by telephone that the consequences of fuel rod bow are required to be addressed prior to completion of the review of the ECCS evaluation and reanalysis for the Kewaunee Plant. Although three specific ECCS analyses have been provided since issuance of Appendix K to Title 10 CFR Part 50, this was the first request we had received for information regarding rod bow as it specifically applies to the Kewaunee Plant.

The generic issue of rod bow effects has been addressed by Westinghouse in WCAP 8692, non-proprietary and WCAP 8691, proprietary. The anaiyses provided in these documents are presently being evaluated by the Commission's staff. A review of this analysis has been performed by our engineering personnel. This review indicated that the Kewaunee Plant is enveloped by the analyses provided in these WCAP reports.

Since the above-mentioned Westinghouse generic analyses result in no additional penalties for the Kewaunee Plant, a specific analysis for Kewaunee at this time would not be justified. Specific commitments concerning operating limits or monitoring at this time would also be premature in view of the generic evaluation presently in progress.

During our review of the WCAP analysis, it was noted that:

 Fuel rod inspections of Westinghouse operating plants have discovered rod bow; however, rod bow has not been observed in the uppermost span of fuel rods (between grids 6 and 7).

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> 2. The maximum effect of rod bow is in the 16×16 element which results in a penalty of 5.6%. The penalty of 14×14 element employed at Kewaunee is 4.25%.

Although we consider any action to reduce the operating margin of the Kewaunee facility premature in view of the generic evaluation presently in progress, we note that an adequate margin exists between the $F_Q \ X \ P_{Rel}$ limits assumed in the safety analyses and the maximum predicted $F_Q \ X \ P_{Rel}$ for CAOC operation as presented in our submittal of January 22, 1976. This margin would be adequate to accommodate the 4.25% worst case penaity of a 14 x 14 element over all fuel element grid spans where rod bow has been observed.

Yours very truly,

E. W. James, Sen or Vice-President Power Supply and Engineering

EWJ/m1