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December 1, 1997

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

Gentlemen:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Additional Information Regarding the Use of High Thermal Performance DNB Correlation in the Kewaunee Reload Methods

References: 1) Letter from M. L. Marchi (WPSC) to NRC Document Control Desk, dated September 4, 1997

- 2) EMF-92-153(P)(A) and Supplement 1, Siemens Power Corporation Report, HTP: Departure From Nucleate Boiling Correlation for High Thermal Performance Fuel, March 1994
- 3) Letter from R. J. Laufer (NRC) to M. L. Marchi (WPSC), dated November 6, 1997

In Reference 1, Wisconsin Public Service Corporation requested that the Nuclear Regulatory Commission review the use of the Siemens Power Corporation's High Thermal Performance Departure from Nucleate Boiling Correlation at the Kewaunee Plant. The NRC provided two requests for additional information in Reference 3. WPSC's responses are provided below.

Q1. How does the 1.47 maximum axial peak used in the HTP data base compare with typical values expected in the Kewaunee core? If values greater than 1.47 are expected in the Kewaunee core, please explain why 1.47 is an acceptable maximum value for the HTP data base; and

Typical measured axial peak values for Kewaunee are presented in Table 1. These values are derived from Cycle 22 flux map measurements. 000073



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Document Control Desk December 1, 1997 Page 2

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TABLE 1			
Flux Map	Cycle Burnup	Measured Maximum Axial Peak	Measured Maximum Axial Peak With Uncertainties
2205	514	1.22	1.39
2206	1041	1.21	1.37
2207.	1715	1.22	1.37
2208	2394	1.20	1.35
2209	3498	1.20	1.33
2210	4437	1.17	1.32

As shown, the highest measured axial peak in Cycle 22 to date is 1.22 without uncertainty and 1.39 with uncertainty. All values are bounded by the maximum axial peak of 1.47 that is used in the HTP data base.

Cycle 22 design maximum axial peak values with and without uncertainties and measured maximum axial peak values with uncertainties are presented in Figure 1. All values are shown to be under the 1.47 limit. Measured values are expected to remain below 1.47, following the design value trend curve, as the fuel cycle burns to end of cycle.

Therefore, based on an evaluation of a typical core's (Cycle 22) design and measured results, axial peak values greater than 1.47 are not expected in the Kewaunee core. The 1.47 limit would also be expected to bound future reload cores that are designed and operated to similar constraints.

Q2. The largest grid spacer pitch in the HTP test sections was 22.4 inches. The Kewaunee value is 26.2 inches. Since a shorter grid spacing would result in a higher critical heat flux, please explain why the HTP data base is acceptable for Kewaunee.

The grid spacer pitch, defined as the center-to-center axial distance between adjacent grid spacers, is 26.2 inches for Kewaunee fuel. The test case grid spacer pitch values presented in Reference 1, Attachment 1, represent the distance from the top of the upstream spacer to the bottom of the downstream spacer. The Reference 2 definition of grid spacer pitch was provided in Reference 1, Attachment 1, at the bottom of the table. These two different definitions of grid spacer pitch have contributed to the concern expressed in this question.

Document Control Desk December 1, 1997 Page 3

5

The HTP critical heat flux correlation is applicable to fuel assemblies whose design characteristics fall within the correlation data base. The following table is recreated from Supplement 1 of Reference 2:

TABLE 2 Nominal Range of Fuel Design Parameters in HTP Correlation Data Base				
Parameter	Value			
Fuel Rod Diameter, in.	0.360 - 0.440			
Fuel Rod Pitch, in.	0.496 - 0.580			
Axial Spacer Span, in.	10.5 - 26.2			
Hydraulic Diameter, in.	0.4571 - 0.5334			
Heated Length, ft.	8.0 - 14.0			

Test assembly 49 which was incorporated into the WPS HTP CHF qualification analyses does have a center-to-center axial spacer pitch of 26.2 inches as shown in Table 3.1 of Reference 2. The Kewaunee spacer pitch is 26.2 inches; therefore, this correlation database is acceptable for use with Kewaunee fuel.

Should you have any additional questions concerning this information, please contact me.

Sincerely,

M houles

Mark L. Marchi Manager-Nuclear Business Group

JTH/smm

Attach.

cc - US NRC - Region III US NRC Senior Resident Inspector FIGURE 1

Cycle 22 Fz vs. Exposure 2.0 1.9 1.8 1.7 1.6 1.5 1.4 1.3 1.2 1.1 <mark></mark> 1.0 0.9 0.8 0.7 0.6 0.5 0.4 Design with uncertainties Design without uncertainties 0.3 Limit Measured with uncertainties 0.2 0.1 0.0 10000 12000 14000 16000 18000 4000 2000 6000 0 8000 **Cycle Exposure**