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 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G. W. PWR Project Directorate 7

SEE SUBJECT FILES

SUBJECT: Forwards nonproprietary CEN-332(S)-NP & proprietary
 (EN-3322(S)-P, "Songs 2 End of Cycle 2 Shoulder Gap
 Evaluation." Affidavit encl. Proprietary rept withheld
 (ref 10CFR2.790).

NP

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May 23, 1986

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Director
PWR Project Directorate No. 7
Division of PWR Licensing - B
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

- References: (1) July 25, 1983 letter from K. P. Baskin (SCE) to George W. Knighton (NRC), Subject: Fuel Element Assembly Shoulder Gap Clearance, San Onofre Nuclear Generating Station, Units 2 and 3;
- (2) January 28, 1985 letter from M. O. Medford (SCE) to George W. Knighton (NRC), same subject.

By the above Reference 1 Southern California Edison Company (SCE) committed to the following:

Prior to entering Startup (Mode 2) after each refueling, SCE shall either provide a report that demonstrates that the existing fuel element assembly (FEA) has sufficient available shoulder gap clearance for at least the next cycle of operation, or identify to the NRC and implement a modified FEA design that has adequate shoulder gap clearance for at least the next cycle of operation. This commitment will apply until the NRC concurs that the shoulder gap clearance provided is adequate for the design life of the fuel.

This commitment was satisfied for Cycle 2 operation by submittal of Reference 2, and Cycle 2 operation of San Onofre Unit 2 was completed on March 14, 1986. During the current San Onofre Unit 2 refueling outage, shoulder gaps and guide tube lengths were measured in 15 fuel assemblies, and appropriate analyses of these measurements were performed. SCE hereby provides report "CEN-332(S)-P, SONGS 2 End of Cycle 2 Shoulder Gap Evaluation," dated May 1986 which summarizes these end-of-cycle (EOC) 2 measurements and inspections and describes the shoulder gap demonstrating that the fuel assemblies have sufficient available shoulder gap clearance for

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	<i>NRC FOR</i>	<i>1</i>	<i>NP</i>

Ltr Encl

Cycle 3 operation. In addition to satisfying the above commitment for Cycle 3 operation, based on the acceptable results from the recently completed EOC 2 measurements and analyses of the Batch C fuel, the lower peak rod burnup for Batch D, and the 50% longer initial shoulder gaps in Batch D, it is also concluded that the Batch D fuel assemblies are acceptable for operation through Cycle 4 with regard to shoulder gap clearance. Therefore, the enclosed report satisfies the above commitment for Cycle 3 and 4 operation of San Onofre Unit 2.

This report is also considered applicable to Unit 3 Cycles 3 and 4 operation based upon the Unit 3 batches "C and D" controlling processes and parameters being identical to those of Unit 2, including: 1) fuel management program; 2) fuel rod thermal and burnup characteristics; 3) fuel assembly design (including guide tube and end fitting material); 4) initial shoulder gap dimensions and tolerances; and 5) manufacturing processes.

Please find enclosed three (3) copies of the following proprietary Combustion Engineering document including an affidavit setting forth the basis on which the information may be withheld from public disclosure by the Commission and addressing specifically the considerations listed in 10 CFR 2.790(b) of the Commission's regulations.

Enclosure 1 - CEN-332(S)-P, SONGS 2 End of Cycle 2 Shoulder Gap Evaluation, May 1986. (Copy Nos. 000001, 000002 and 000003).

It is respectfully requested that the above information which is proprietary to CE be withheld from public disclosure in accordance with 10 CFR 2.790(b) of the Commission's regulations. If you should have any questions concerning the proprietary nature of the material transmitted herewith, please address these questions directly to:

Mr. A. E. Scherer
Director, Nuclear Licensing
Combustion Engineering Inc.
P. O. Box 500
Windsor, CT 06095-0500

It is also requested that you may provide a copy of any questions concerning the proprietary nature of this document to SCE and SDG&E.

Three (3) copies of the following nonproprietary version of Enclosure 1 are also enclosed to satisfy the requirements for transmittal of proprietary information to the NRC;

Mr. G. W. Knighton

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Enclosure 2 - CEN-332(S)-NP, SONGS 2 End of Cycle 2 Shoulder Gap
Evaluation, May 1986.

If there are any questions concerning this report, please contact me.

Very truly yours,



Enclosures

cc: H. Rood, NRC (to be opened by addressee only - Enclosure 1 Copy
No. 000004 and Enclosure 2)
F. R. Huey, USNRC Senior Resident Inspector (Enclosure 2 only)