



Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066
USA

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Direct tel: (412) 374-4643
Direct fax: (724) 940-8560
e-mail: greshaja@westinghouse.com

LTR-NRC-16-17

April 6, 2016

Subject: Request for Closed Meeting to Discuss Plans for Lead Test Assemblies Containing the Developmental **AXIOM** Cladding Material

Westinghouse is requesting a meeting with the Nuclear Regulatory Commission to review the ongoing development of **AXIOM**TM cladding. The development program is entering its final phases which include the insertion of lead test assemblies (LTAs) to verify performance and safe operation. It is the intention of Westinghouse along with Dominion Generation and Southern Nuclear Operating Company to submit License Exemption Requests (LER) no later than June 2016 for insertion of LTAs in the fall of 2017.

AXIOM cladding has already been irradiated in 2 lead test rod programs at the Byron (ML090490645) and V.C. Summer (ML081220827) nuclear plants which achieved successful operation to over 70 GWd/MTU. The AXIOM cladding material is slightly different in composition than the currently licensed **ZIRLO**[®] alloy tubes and **Optimized ZIRLO**TM cladding.

Westinghouse is proposing to insert 8 LTAs into each core of Vogtle Unit 2 and Millstone Unit 3 starting in the fall of 2017. After each cycle, poolside visual inspections will be performed and after the 2nd and 3rd cycles, peripheral rod oxide measurements will be taken. Westinghouse is also investigating the potential to take one or more of the LTAs to higher than the current licensed 62 GWd/MTU burnup limit.

The LTA program licensing schedule would include submittal of the LERs for the 2 units by June 2016 with requested approval in March 2017 or approximately 9 months. This will allow sufficient manufacturing lead time prior to the fabrication and shipment of the LTAs. The LERs will request exemption from 10 CFR 50.46, "Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors," and 10 CFR 50 Appendix K, "ECCS Evaluation Models."

ZIRLO, Optimized ZIRLO, and AXIOM are trademarks or registered trademarks of Westinghouse Electric Company LLC, its affiliates and/or its subsidiaries in the United States of America and may be registered in other countries throughout the world. All rights reserved. Unauthorized use is strictly prohibited. Other names may be trademarks of their respective owners.

ADD
NRR

Correspondence with respect to the content of this letter should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

A handwritten signature in black ink, appearing to read 'J. Gresham', written in a cursive style.

James A. Gresham, Manager
Regulatory Compliance

cc: Ekaterina Lenning
Kevin Hsueh