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SUBJECT: Requests that NRC accelerate review of proposed extended fuel limits to increase allowable exposure of SPC 9X9-2 fuel from GWD/MTU.						
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Robert G. Byram Senior Vice President—Nuclear 610/774-7502 Fax: 610/774-5019

AUG-1 5 1994

Director of Nuclear Reactor Regulation Attention: Mr. C.L. Miller, Project Director Project Directorate I-2 Division of Reactor Projects U.S. Nuclear Regulatory Commission Washington, D. C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST TO ACCELERATE REVIEW OF PROPOSED
EXTENDED FUEL EXPOSURE LIMITS
PLA-4180 FILES A17-2/R41-2

Docket Nos. 50-387

and 50-388

References:

- 1. PLA-4147, R.G. Byram to C.L. Miller, "Request for Extended Fuel Exposure Limits", dated May 31, 1994.
- 2. PP&L Licensing Topical Report PL-NF-94-005-P, "Technical Basis for SPC 9X9-2 Extended Fuel Exposure at Susquehanna SES", dated May 16, 1994.

#### Dear Mr. Miller:

The purpose of this letter is to request that the NRC accelerate its review of the referenced PP&L submittal to increase allowable exposure of SPC 9X9-2 fuel from 40 to 45 GWD/MTU. This proposal was discussed with Mr. C. Poslusny and Mr. S. Wu of NRR on August 2, 1994 during our quarterly status meeting.

Reference 1 requested NRC review of a PP&L Licensing Topical Report (Ref. 2) prior to March 1995 in order to support design of the Unit 1 Cycle 10 core. In that submittal, PP&L determined this action to meet Cost Beneficial Licensing Action criteria. PP&L has recently decided to utilize additional short term resources in order to realize the projected economic benefits described in Reference 1 sooner, i.e., for Unit 2 Cycle 8 (U2C8). U2C8 design development has begun, with operation currently scheduled to begin in November 1995.

In order to support this goal, PP&L is proposing the milestone schedule shown in Attachment 1.

PP&L is requesting completion of the NRC SER on the LTR by November 1 in order to eliminate the risk associated with proceeding with ordering the enrichment to support fabrication of the U2C8 design. We believe that the referenced submittal clearly indicates that all relevant mechanical design criteria are met to support a maximum assembly exposure of 45 GWD/MTU for SPC 9X9-2 fuel for U2C8 and future cycles. We are confident that inspection results will validate this belief by meeting the appropriate inspection criteria established in the referenced submittal. The inspection results will be provided with

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FILES A17-2/R41-2 PLA-4180 Mr. C. L. Miller

the license amendment submittal for NRC review. Should the inspections provide unanticipated results, we will inform you. The license amendment will simply add a reference to the LTR in Technical Specification 6.9.3.2, "Core Operating Limits Report."

Any questions on this submittal should be directed to Mr. R. Sgarro at (610) 774-7914.

Very truly yours,

R. G. Bylam

Attachment

cc: NRC Document Control Desk (original)

NRC Region I

Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES

Mr. C. Poslusny, Jr., NRC Sr. Project Manager - OWFN

Mr. S. Wu, NRR/SRXB - OWFN

**ATTACHMENT 1 TO PLA-4180** 

## PP&L PROPOSED MILESTONE SCHEDULE: NRC REVIEW OF EXTENDED FUEL EXPOSURE

DATE	ACTIVITY
May 31, 1994	PP&L LTR submitted for NRC review
October, 1994	PP&L/SPC perform lead use assembly (LUA) inspections
November 1, 1994	NRC issues Safety Evaluation on LTR
	PP&L preliminary inspection data available
November 11, 1994	PP&L orders U2C8 enrichment
December 16, 1994	SPC report on LUA inspections to PP&L
January 13, 1995	PP&L final report on LUA inspections
January 19, 1995	PORC review of license amendment
January 23, 1995	SRC review of license amendment
January 25, 1995	PP&L submits license amendment to NRC
April 14, 1995	U2C8 fuel bundle fabrication begins
August 1, 1995	NRC issues license amendment
September 9, 1995 · ·	U2 7th Refueling outage begins
November, 1995	U2C8 begins