

## JUN 2 8 2017

L-2017-118 10 CFR 50.46(a)(3)(ii)

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

NextEra Energy Duane Arnold, LLC Duane Arnold Energy Center Docket No. 50-331

Subject:

10 CFR 50.46 30-Day Special Report of Changes in Peak Cladding Temperature for

the Duane Arnold Energy Center

Reference:

Letter from L. Nicholson (Florida Power & Light Company) to USNRC, "10 CFR

50.46 Annual Reporting of Changes to, or Errors in Emergency Core Cooling

System Models or Applications," L-2017-014, April 17, 2017.

In accordance with 10 CFR 50.46(a)(3)(ii), Florida Power & Light acting as agent for NextEra Energy Duane Arnold, LLC (NextEra), hereby provides this 30-day special report regarding changes in the calculated peak cladding temperature (PCT) of the GNF2 fuel design currently utilized at the Duane Arnold Energy Center (DAEC).

Our fuel vendor, Global Nuclear Fuels (GNF), has notified NextEra of the potential impact of one newly-identified error in the current Loss-of-Coolant Accident analysis methodology and its application that has occurred subsequent to the referenced annual report. Enclosed is a historical summary of previously reported changes or errors, as well as the potential impact of the new error on the GNF2 fuel design currently utilized at DAEC.

This new error, when combined (sum of the absolute magnitudes) with all the applicable PCT changes previously reported for the GNF2 fuel design, results in a cumulative PCT change for DAEC of greater than the 50 °F reporting threshold under 10 CFR 50.46(a)(3)(i). Although this is defined as a "significant change" under 10 CFR 50.46, the actual impact on nuclear safety is negligible, as DAEC has significant margin, over 450 °F, to the regulatory limit of 2200 °F PCT in 10 CFR 50.46(b)(1). Thus, a full re-analysis for GNF2 fuel design is not currently scheduled for the DAEC as a result of these cumulative changes.

This submittal contains no new commitments or revisions to existing commitments.

Sincerely,

Larry Nicholson

Director, Nuclear Licensing and Regulatory Compliance

Enclosure (1)

cc: Administrator, Region III, USNRC

Project Manager, Duane Arnold Energy Center, USNRC Resident Inspector, Duane Arnold Energy Center, USNRC

## **Enclosure 1**

## **Summary Rack-Up Sheet GNF2 Fuel**

LOCA Margin Summary Sheet - 30 Day Report

Plant Name:

**Duane Arnold Energy Center** 

**Utility name**:

NextEra Energy

Evaluation Model:

GE Hitachi Report, "Duane Arnold Energy Center GNF2 ECCS-LOCA

Evaluation," GNF Report 0000-0133-6901-R0, DRF 0000-0133-6885-R0,

August 2012

<u>Last Acceptable Evaluation Model Analyzed PCT</u>:

1730 °F

			Net PCT Effect	Absolute PCT Effect
A	Prior 10 CFR 50.46 Changes or Error Corrections – up to Year N-1	ΔΡСΤ	10 °F	50 °F
В	Prior 10 CFR 50.46 Changes or Errors Corrections – Year N	ΔΡСΤ	None	None
С	Current 10 CFR 50.46 Changes			
	1. Impact of modeling forward and backward leakage paths through the bottom of the fuel bundle	ΔΡСΤ	-20 °F	20 °F
	Absolute Sum of 10 CFR 50.46 Changes	ΔΡСΤ	-10 °F	70 °F

The sum of the PCT from the most recent analysis using an acceptable evaluation model and the estimates of PCT impact for changes and errors identified since this analysis	1720 °F < 2200 °F
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