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DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards proprietary "seismic Evaluation of Exxon Nuclear 17X17 Assemblies in Westinghouse PWRs," re safety evaluation & EIA concerning, Amend 48 to License DPR-74.Rept withheld (ref 10CFR2.790).

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631 COLUMBUS, OHIO 43216

November 11, 1983

AEP: NRC: 0637R

Donald C. Cook Nuclear Plant Unit 2 Docket No. 50-316 License No. DPR. 74 SEISMIC EVALUATION OF THE STRUCTURAL ADEQUACY OF THE FUEL ASSEMBLIES

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Denton:

This letter transmits the attached information concerning the Safety Evaluation And Environmental Impact Appraisal, Related to Amendment 48 to Facility Operating License No. 74, Section B, paragraph 2.10. Paragraph 2.10 of the Appraisal indicates that the licensee must submit an analysis of the seismic effect of the Exxon fuel on the structural adequacy of the D. C. Cook Nuclear Plant Unit 2 fuel assemblies.

During a telephone conference on April 25, 1983 between Messrs. D. Wigginton, R. Meyer, S. L. Wu of your staff; Mr. G. Owsley of Exxon Nuclear Co.; and Messrs. T. R. Satyan-Sharma and H. Sobel of our staff, the participants agreed that a comparative seismic analysis would satisfy the above Appraisal condition. The analysis would compare the strength of critical Exxon assembly components with loads calculated by Westinghouse.

Attachment 1 to this letter provides the details of the comparative seismic analysis, which was primarily provided to us by Exxon Nuclear Company. Attachment 1 also contains certain information which was provided to us by Westinghouse Electric Corporation. The details to the Westinghouse mathematical model for the analysis are shown in Figure 2-4 of the Westinghouse Report (W-CAP) 8236, dated December, 1973. The details of the Exxon mathematical model for the analysis are shown in Figure 4-1 of the Exxon Report XN-NF-76-47(P)(A), dated January, 1982. Based on the comparative analysis and the Guide Tube Stress analysis detailed in Attachment No. 1, we believe that the Exxon fuel is similar in strength to the Westinghouse fuel and is capable of withstanding the design basis seismic events. We believe this comparative analysis of the Exxon fuel satisfies the NRC staff's concern noted in the above Appraisal.

Attachment 1 to this submittal contains information proprietary to both Westinghouse Electric Corporation and Exxon Nuclear Company.

Therefore, this submittal is supported by an Application For

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 Withholding (CAW-83-87) from Westinghouse dated October 11, 1983, which authorizes the attached Affidavit (AW-78-23); and an Affidavit from Exxon dated October 11, 1983. The affidavits set forth the basis on which the information may be withheld from public disclosure by the Commission and addresses, with specificity, the considerations listed in Paragraph (b) (4) of 10 CFR 2.790 of the Commission's regulations. Accordingly, it is requested that the information which is proprietary to Westinghouse and Exxon be withheld in accordance with 10 CFR 2.790 of the Commission's regulations. Correspondence with respect to the proprietary aspects of the Westinghouse Application For Withholding or the supporting affidavit should refer to CAW-83-87 and should be addressed to R. A. Wiesemann, Manager Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, PA 15230. The Affidavits are provided as Attachments 2 and 3 for Westinghouse and Exxon, respectively.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours

Vice President

MPA/pb

cc: John E. Dolan

W. G. Smith, Jr. - Bridgman

R. C. Callen

G. Charnoff

E. R. Swanson, NRC Resident Inspector - Bridgman

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