



## Global Nuclear Fuel

### Proprietary Notice

This letter transmits proprietary information in accordance with 10 CFR 2.390. Upon removal of Enclosure 1, the balance of the letter may be considered non-proprietary.

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M190136

July 23, 2019

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555-0001

### **Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update**

A little over 12 years ago, Reference 1 provided a report on the surveillance of installed Marathon control rods. Consistent with the annual surveillance program updates provided in References 2 - 11, this letter provides an update to the inspections of Marathon control rods as well as plans for additional examinations and testing. The title of the surveillance program update report has been modified to reflect the surveillance updates for both Marathon-5S and Marathon-Ultra control rods.

Please note that Enclosure 1 contains proprietary information of the type that GE-Hitachi Nuclear Energy Americas LLC (GEH) maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GEH as indicated in its affidavit, which is also included in the report. The affidavit contained in Enclosure 3 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GEH. GEH hereby requests that the information in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

Enclosure 1 is the proprietary version of the Marathon and Ultra Control Rod Lifetime Surveillance Update and Enclosure 2 is a non-proprietary version. Enclosure 3 contains the affidavit for the Marathon and Ultra Control Rod Lifetime Surveillance Update.

If you have any questions, please contact Scott Nelson at 910-819-5829 or myself.

Sincerely,



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Project No. 710  
Docket No. 99902024

References:

1. Letter from Robert E. Brown (GE) to Document Control Desk (NRC), Subject: Marathon Control Rod Assembly Surveillance Program Status, MFN 07-138, February 26, 2007.
2. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon Control Rod Assembly Surveillance Program Update, MFN 08-355, April 11, 2008.
3. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon Control Rod Assembly Surveillance Program Update and Marathon Control Rod Post-Irradiation Examination (PIE), MFN 09-266, April 29, 2009.
4. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon Control Rod Assembly Surveillance Program Update, MFN 10-153, May 14, 2010.
5. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon Control Rod Assembly Surveillance Program Update, MFN 11-184, June 16, 2011.
6. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Assembly Surveillance Program Update, MFN 12-091, July 30, 2012.
7. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update, MFN 13-034, July 9, 2013.
8. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update, MFN 14-050, August 6, 2014.
9. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update, MFN 15-068, August 18, 2015.

10. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update, MFN 16-047, July 14, 2016.
11. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update, M170137, June 1, 2017.
12. Letter from James F. Harrison (GEH) to Document Control Desk (NRC), Subject: Marathon and Ultra Control Rod Lifetime Surveillance Update, M180156, July 25, 2017.

Enclosures:

1. NEDC-33856P, Revision 5, GEH Marathon and Ultra Control Rod Lifetime Surveillance Update - GEH Proprietary Information – Non-Public
2. NEDO-33856, Revision 5, GEH Marathon and Ultra Control Rod Lifetime Surveillance Update - GEH Information –Public
3. Affidavit dated July 2019

cc: J Golla (NRC)  
BR Moore (GNF Wilmington)  
Michelle Catts (GEH Wilmington)  
DS Nelson (GEH Wilmington)

**Document Components:**

- 001 M190136 Cover Letter.pdf
- 002 M190136 Enclosure 1 Proprietary.pdf
- 003 M190136 Enclosure 2 Non-Proprietary.pdf
- 004 M190136 Enclosure 3 Affidavit.pdf