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TU ELECTRIC

William J. Cahill, Jr.
 Executive Vice President

December 28, 1990

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NO. 50-445 AND 50-446
 RELOAD ANALYSIS PROGRAM
 SUPPLEMENT 1 TO RXE-88-102-P, TUE-1 DNB CORRELATION

Gentlemen:

The TU Electric reload analysis program was discussed with the NRC staff in meetings at the NRC offices in December, 1988, and again in July, 1990. Following the July discussions, the schedule for submittal of the TU Electric topical reports was provided in TXX-90342. Consistent with that schedule, attached for your review and approval, is the TUE-1 Technical Note for Advanced Nuclear Fuel (ANF) fuel.

The first topical report for the TU Electric reload analysis program, TU Electric DNB Correlation, RXE-88-102-P, was submitted on January 31, 1989 by TU Electric letter TXX-89025. Supplement 1 to RXE-88-102-P, "TUE-1 Departure from Nucleate Boiling Correlation," expands the qualification of the TUE-1 correlation to encompass ANF fuel. The original report, in combination with Supplement 1, provides a description of the TUE-1 DNB correlation, comparison of calculated and experimental data, and a statistical analysis to quantify the 95/95 DNBR limit for Westinghouse and ANF fuel. The correlation is utilized in the TU Electric VIPRE-01 analysis methodology presented in RXE-89-002, "VIPRE-01 Core Thermal-Hydraulic Analysis Methods for Comanche Peak Steam Electric Station Licensing Applications," which was submitted to you on June 30, 1989.

Approval of the enclosed report, along with approvals of those previously submitted and those yet to be submitted, are required to allow TU Electric to license cycle 3 operation without recourse to a nuclear fuel vendor. (Cycle 3 refueling begins in September, 1992.) TU Electric requests that the NRC review and approve the enclosed report by September, 1991.


APol
 [Signature]


Advanced Nuclear Fuels Corporation considers information contained in the report, RXE-88-102-P, "TUE-1 DNB Correlation, Supplement 1" to be proprietary. In accordance with the requirements of 10 CFR 2.790(b) for the withholding of proprietary information from public disclosure, an affidavit is enclosed.

An ANF Proprietary Information Notice, an Application for Withholding and an accompanying Affidavit, are enclosed. Correspondence with respect to the proprietary aspects of the Application for Withholding or the supporting ANF Affidavit should be addressed to Advanced Nuclear Fuels Corporation, Attention Robert A. Copeland, 2101 Horn Rapids Road, P.O. Box 130, Richland, WA, 99352-0130.

Should you have any questions or comments regarding the enclosed technical note or the TU Electric Reload Analysis Program, please contact Jimmy D. Seawright (214) 812-4375 or Mickey R. Killgore (214) 812-8271 of my staff.

Sincerely,


William J. Cahill, Jr.

By: 
Roger D. Walker
Manager of Nuclear Licensing

JDS/gj
Attachment

c - Mr. R. D. Martin, Region IV (NP Version)
Resident Inspectors, CPSES (3) (NP Version)
Mr. J. W. Clifford, NRR (NP Version)

6. The information contained in the Document is considered to be proprietary by ANF because it reveals certain distinguishing aspects of ANF DNB licensing methodology which secure competitive advantage to ANF for fuel design optimization and marketability, and includes information utilized by ANF in its business which affords ANF an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

7. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it valuable insights into ANF DNB licensing methodology and would result in harm to the competitive position of ANF.

8. The Document contains proprietary information which is held in confidence by ANF and is not available in public sources.


9. In accordance with ANF's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside ANF only as required and under suitable agreement providing for nondisclosure and limited use of the information.

10. ANF policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

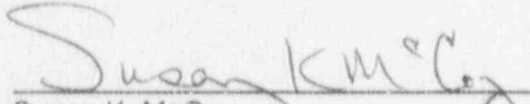
11. Information in this Document provides insight into ANF DNB licensing methodology developed by ANF. ANF has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as ANF, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ANF.

THAT the statements made hereinabove are, to the best of my knowledge, information,
and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.



SUBSCRIBED before me this 14th
day of December, 1990.



Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/92