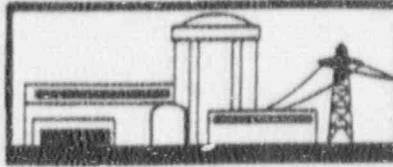


THE B&W OWNERS GROUP



Arizona Power & Light Company
 Duke Power Company
 Florida Power Corporation
 GPU Nuclear Corporation

AND-1
 Oconee 1, 2, 3
 Crystal River 3
 TVA-1

Sacramento Municipal Utility District
 Toledo Edison Company
 Tennessee Valley Authority
 Babcock & Wilcox Company

Rancho Seco
 Davis Besse
 Bohemian 1, 2

Working Together to Economically Provide Reliable and Safe Electrical Power

Suite 525 • 1700 Rockville Pike • Rockville, MD 20852 • (301) 230-2100

February 8, 1991

OG-843
 NE-2080

United States Nuclear Regulatory Commission
 ATTN: Document Control Desk
 Washington, D.C. 20555

Subject: Submittal of Topical Report BAW-10179P, Safety Criteria and Methodology for Acceptable Cycle Reload Analyses, February 1991.

Gentlemen:

Enclosed are twenty (20) copies of Topical Report BAW-10179P, Safety Criteria and Methodology for Acceptable Cycle Reload Analyses. This report is being submitted by the B&W Owners Group to provide the criteria and methodology for calculating cycle-specific values for certain limiting conditions for operation, protective limits, and maximum allowable setpoint limits. The report also provides the criteria and methodology for fuel design change for the Mark-B fuel supplied for the B&W-designed 177-fuel assembly class of plants. Pending NRC approval, this report will serve as an approved methodology to be referenced in the Core Operating Limits Report portion of the administrative section of plant technical specifications for the utilities in the B&W Owners Group that are participating in this activity. This will allow placing values of certain cycle-specific parameters in a Core Operating Limits Report (COLR) in accordance with NRC Generic Letter 88-16.

The B&W Owners Group requests, in accordance with 10CFR2.790, that this report be considered proprietary. An affidavit supporting this request, signed by James H. Taylor, Manager, Licensing Services, B&W Nuclear Technologies, is attached. In accordance with the guidelines of NUREG-0390, three additional copies of the report are attached in which the proprietary material has been identified. Material enclosed in hand written brackets in these three reports is to be considered proprietary to the B&W Owners Group.

Very truly yours,

Raymond E. Sund
 R. E. Sund, Chairman
 B&W Owners Group,
 Core Performance Committee

RES:tam
 Attachments

910919 0350
 PDR TOPRP
 910208
 ENK/BW
 POK

Good Change
 1/20

ALL LDR'S	1	0
NRC POR	1	0
NSIC	1	0

Att Genl

OG-843
NE-2080
February 8, 1991
Page 2

cc: R. C. Jones, Chief
Reactor Systems Branch
Division of Systems Technology
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Mrs. Valeria Wilson, Chief
Administration Section
Planning Program and Management Support Branch
Program Management, Policy Development and Analysis Staff
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555

T. W. Alexion, NRR Project Manager, Region 4/ANO-1
United States Nuclear Regulatory Commission
NRR Mail Stop 11-B-19
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

D. C. DiIanni, Senior Project Manager
United States Nuclear Regulatory Commission
One White Flint North 13 E 21
11555 Rockville Pike
Rockville, MD 20852

R. W. Hernan, Project Manager
Project Directorate 1-4
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

H. Silver, Project Manager
United States Nuclear Regulatory Commission
Mail Stop 14-H-24
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

OG-843
NE-2080
February 8, 1991
Page 3

cc: Core Performance Committee

P. F. Bailey	DPC
T. P. Gillespie	DPC
J. D. McCarthy	GPUN
D. M. O'Shea	FPC
W. A. Rush	Entergy
J. J. Sapyta	B&W
R. T. Tropasso	GPUN/TMI

cc: Technical Specifications Committee

P. J. North	DPC
G. C. Shieck	B&W
C. W. Smyth	GPUN

cc: Steering Committee

R. L. Black	B&W
A. B. Cox	Entergy
W. T. O'Connor	TE
N. A. Rutherford	DPC
B. Schofield	TVA
P. S. Walsh	GPUN
R. C. Widell	FPC

cc: Licensing Personnel at Utilities and at B&W

J. J. Fisicaro	Entergy
R. L. Gill	DPC
R. W. Schrauder	TE
J. H. Taylor	B&W
J. Wetmore	GPUN
K. Wilson	FPC

AFFIDAVIT OF JAMES H. TAYLOR

- A. My name is James H. Taylor. I am Manager of Licensing Services for B&W Nuclear Technologies, a participating member in the B&W Utility Owners Group (B&WOG) and as such I am authorized to execute this Affidavit.
- B. I am familiar with the criteria applied by the Nuclear Regulatory Commission (NRC) to determine whether certain information of the B&WOG is proprietary.
- C. In determining whether a B&WOG document is to be designated as proprietary information, an initial determination is made by the Unit Manager who is responsible for originating the document as to whether it falls within the criteria set forth in Paragraph D hereof. If the information falls within any one of these criteria, it is designated as proprietary by the originating Unit Manager. This initial determination is reviewed by the cognizant manager at the next higher organizational level. If the document is designated as proprietary, it is reviewed again by me to assure that the regulatory requirements of 10 CFR Section 2.790 are met.
- D. The following information is provided to demonstrate that the provisions of 10 CFR Section 2.790 of the Commission's regulations have been considered:
- (i) The information has been held in confidence by the B&WOG. Copies of the document are clearly identified as proprietary.
 - (ii) The following criteria are customarily applied by the B&WOG in a rational decision process to determine whether the information should be designated as proprietary. Information may be designated as proprietary if one or more of the following criteria are met.
 - a. Information reveals cost or price information, commercial strategies, production capabilities, or budget levels of the B&WOG or its suppliers.

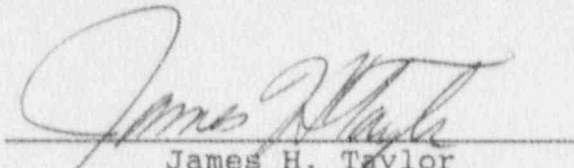
- b. The information reveals data or material concerning the B&WOG research or development plans or programs of present or potential economic advantage to the B&WOG.
- c. The use of the information by a non-member would decrease his expenditures, in time or resources, in designing, producing, or marketing a similar product.
- d. The information consists of test data or other similar data concerning a process, method or component, the application of which results in an economic advantage to the B&WOG.
- e. The information reveals special aspects of a process, method, component or the like, the exclusive use of which results in an economic advantage to the B&WOG.
- f. The information contains ideas for which patent protection may be sought.

The document(s) listed on Exhibit "A", which is attached hereto and made a part hereof, has been evaluated in accordance with the B&WOG procedures with respect to classification and has been found to contain information which falls within one or more of the criteria enumerated above. Exhibit "B", which is attached hereto and made a part hereof, specifically identifies the criteria applicable to the document(s) listed in Exhibit "A".

- (iii) The document(s) listed in Exhibit "A", which has been made available to the United States Nuclear Regulatory Commission was made available in confidence with a request that the document(s) and the information contained therein be withheld from public disclosure.
- (iv) The information is not available in the open literature and to the best of our knowledge is not known by other organizations with interests and activities similar to those of the B&WOG.

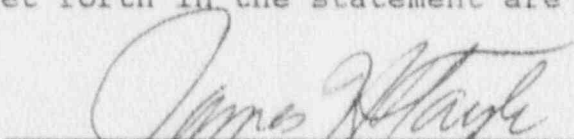
(v) Specific information with regard to whether public disclosure of the information is likely to cause economic harm to the position of the B&WOG, taking into account the value of the information to the B&WOG; the amount of effort or money expended by the B&WOG developing the information; and the ease or difficulty with which the information could be properly duplicated by others is given in Exhibit "B".

E. I have personally reviewed the document(s) listed on Exhibit "A" and have found that it is considered proprietary by the B&WOG because it contains information which falls within one or more of the criteria enumerated in Paragraph D, and it is information which is customarily held in confidence and protected as proprietary information by the B&WOG. This report comprises information utilized by the B&WOG in its business which afford the B&WOG an opportunity to obtain an economic advantage over those who may wish to know or use the information contained in the document(s).

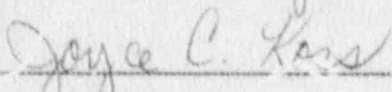

James H. Taylor

State of Virginia)
) SS. Lynchburg
City of Lynchburg)

James H. Taylor, being duly sworn, on his oath deposes and says that he is the person who subscribed his name to the foregoing statement, and that the matters and facts set forth in the statement are true.


James H. Taylor

Subscribed and sworn before me
this 31st day of January 1991.



Notary Public in and for the City of
Lynchburg, State of Virginia

My Commission Expires April 5, 1992

B&W Fuel Company

Exhibit A

SAFETY CRITERIA AND METHODOLOGY
FOR ACCEPTABLE CYCLE RELOAD ANALYSES

BAW-10179P February 1991

Exhibit B

Description of Material

SAFETY CRITERIA AND
METHODOLOGY FOR ACCEPTABLE
CYCLE RELOAD ANALYSES
BAW-10179P February 1991

Applicable Criteria

b,c,d,e