



General Electric Company
123 Carter Avenue, San Jose, CA 95128

August 8, 1991
MFN-077-91

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

SUBJECT: Marathon Control Rod Surveillance Clarification

REFERENCE: Letter, Ashok C. Thadani (NRC), to J. S. Charnley (GE), Subject: "Acceptance for Referencing of Topical Report NEDE-31758P, 'GE Marathon Control Rod Assembly' (TAC NO. 77255)", July 1, 1991.

We were pleased to receive the NRC acceptance letter (see Reference) and its attached safety evaluation report (SER) for the GE Marathon control rod assembly. This represents a significant milestone in the development of improved BWR control rods.

One of the important aspects of the SER prepared by the NRC is the surveillance program. Considerable mutual effort went into developing the description of the approved surveillance program (Attachment 3 to the SER). Subsequent to the issuance of the SER we find that there are facets of the proposed surveillance program that need clarification. It is for the purpose of clarification that this letter is written.

The need for clarification arises from the complexity introduced when a distinction is made between control cell core (CCC) and non-CCC applications of the Marathon control rod. The intent of part A of the GE proposed surveillance program was to visually inspect the lead depletion Marathon control rod in a non-CCC application only if it was the overall lead depletion Marathon control rod.

We believe that part A of the GE Proposed Surveillance Program contained in the SER should be clarified as follows:

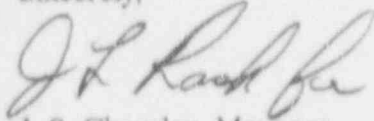
- A. Surveillance of the lead depletion Marathon control rod (domestic or foreign) is acceptable to justify operation of lesser depletion Marathon control rods in non-CCC applications.

The second paragraph of Section 3.0 CONCLUSIONS of the SER should then be clarified to be consistent with the clarified GE Proposed Surveillance Program and not require that the greatest depletion Marathon control rod in a non-CCC application be examined regardless of its relationship to the lead depletion Marathon control rod.

7008 1/0

We respectfully request that you give the clarification presented in this letter your careful consideration and provide us with your response.

Sincerely,



J. S. Charnley, Manager
Fuel Licensing
Mail Code 188, (408)925-3697

/ggj
JSC91025.WP

cc: L. S. Gifford
R. C. Jones Jr. (NRC)