



(2) Section 50.46 of Nuclear Regulatory Commission regulations requires that ECCS analysis be performed with an acceptable evaluation model and result in a calculated maximum fuel element cladding temperature not greater than 2200° F.

(3) ECCS analysis has been performed for the Turkey Point units with an evaluation model utilizing the BART code which has been found acceptable and approved by the NRC. Affidavit of Mark J. Parvin, ¶¶ 4, 5 and 9, August 3, 1984 (included as Attachment to "Licensee's Motion for Summary Disposition of Intervenors' Contention (b)," August 10, 1984) [hereinafter cited as Parvin Affidavit].

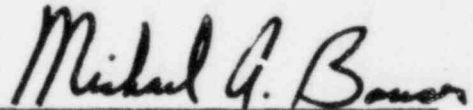
(4) ECCS evaluation model analysis utilizing the BART code results in a peak clad temperature of 1972° F for a homogeneous core. For the limited, transitional period when optimized fuel assembly (OFA) and low-parasitic (LOPAR) fuel are mixed in the core, however, an approximately 2.2% reduction in OFA reflood steam flow rate occurs resulting in approximately a 10° F increase in peak clad temperature (PCT), which is easily accommodated in the margin to the 2200° F 10 C.F.R. § 50.46 limits. Parvin Affidavit, ¶ 5.

(5) ECCS analysis has also been performed for a homogeneous core with the previously approved evaluation model utilizing the Westinghouse Full Length Emergency Cooling Heat Transfer (FLECHT) correlation, resulting in an indicated peak clad temperature of 2130° F. A 10° F increase in

temperature due to a mixed LOPAR and OFA core also results in a PCT less than the 2200° F limit prescribed in 10 C.F.R. § 50.46. Parvin Affidavit, ¶ 8.

(6) Required analyses, properly taking into account reduced reflood flow rates in the OFA regions of the core, have been performed for Turkey Point yielding results consistent with applicable NRC criteria. Parvin Affidavit, ¶ 9.

Respectfully submitted,



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Dated: August 10, 1984