



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 23, 1992

Dr. Thomas E. Murley
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Document Control Desk

Subject: Quad Cities Nuclear Power Station Unit 1
Continued Irradiation of Six Barrier Lead
Test Assembly Rods
NRC Docket No. 50-254

- References: (a) R. Stols (CECo) to T.E. Murley letter dated
November 14, 1990.
- (b) GE-NE-770-18-0692; "Safety Evaluation of
Reconstitution of Quad Cities-1 Cycle 13 Fuel
Bundle", June 1992.

Dr. Murley:

On September 5, 1992, Quad Cities Unit 1 is scheduled to shutdown to refuel for Cycle 13. The purpose of this letter is to inform you of Commonwealth Edison's (CECo) intention to reconstitute six high exposure Barrier Lead Test Assembly (BLTA) rods into another host bundle for continued irradiation during Cycle 13. CECo documented the Cycle 12 irradiation of BLTA rods in Reference (a).

CECo has reviewed the attached General Electric Company Safety Evaluation (Reference (b) and Enclosure 1), which provides an analysis of the continued irradiation of the six BLTA rods. This safety evaluation was performed in accordance with 10 CFR 50.59. Based upon this review, CECo has approved the continued irradiation of the six BLTA rods.

The information contained in Enclosure 1 is considered to be proprietary information to General Electric, and is supported by an affidavit signed by General Electric. Enclosure 2 contains the affidavit that sets forth the basis on which the information may be withheld from public disclosure by the NRC. The affidavit addresses the considerations listed in paragraph (b)(4) of 10 CFR 2.790. Accordingly, CECo requests that the information contained in Enclosure 1 be withheld from public disclosure.

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The six BLTA rods will be extensively examined prior to their reconstitution into LYJ449, a previously irradiated assembly of standard GE8B design, currently operating in Cycle 12. The assembly will be loaded in a non-limiting, non-control cell location for Cycle 13 with a projected average radial peaking factor of approximately 0.73. The highest best estimate rod average exposure for the six BLTA rods at End-of-Cycle 13 is 64.4 Gwd/ST. General Electric's approved Topical Report NEDE-22148-P-A, "Extended Burnup Evaluation Methodology," dated November 1985, states that the General Electric methods are valid for rod average exposures of "at least 54.4 Gwd/ST." General Electric has indicated that the data which supports these methods demonstrates that there is no change in the trends at extended burnups.

The safety evaluation indicated that the presence of the six BLTA rods in the new host bundle has a negligible effect on the fuel bundle neutronic and thermal performance. The evaluation also determined that the effect on transient analysis is negligible due to the limited number of rods involved.

Commonwealth Edison has performed a detailed review of the relevant licensing documents (Technical Specifications and Bases) and has concluded that no changes to the Technical Specifications will be required for the continued irradiation of the six BLTA rods. In accordance with 10CFR50.59, CECO will complete On-Site and Off-Site Reviews to demonstrate that no unreviewed safety questions exist as part of the normal reload design and licensing process for Cycle 13. CECO's documentation of the results of our 50.59 evaluation for the continued irradiation of the six BLTA rods will accompany the submittal of the Core Operating Limits Report prior to unit startup. The current schedule for the start of fuel reload is the early part of November 1992.

If there are any questions or comments on the above information please contact John L. Schrage at 708-515-7283 prior to fuel load.

Sincerely,



John L. Schrage
Nuclear Licensing Administrator

- Enclosures:
1. GE-NE-770-18-0692 General Electric Safety Evaluation of Reconstitution of Quad Cities-1 Cycle 13 Fuel Bundle
 2. General Electric Company Affidavit

cc: A. Bert Davis, Regional Administrator - RIII
L.N. Olshan, NRR Project Manager - Quad Cities
T.E. Taylor, Senior Resident Inspector - Quad Cities
R.C. Jones, Reactor Systems Branch Chief-NRR
L.E. Phillips, Reactor Systems Branch

ENCLOSURE 2

General Electric Company Affidavit

General Electric Company

AFFIDAVIT

I, Janice S. Charnley, being duly sworn, depose and state as follows:

1. I am Manager, Performance Improvement Engineering, General Electric Company, and have been delegated the function of reviewing the information described in paragraph 2 which is sought to be withheld from public disclosure and have been authorized to apply for its withholding.
2. The information sought to be withheld is contained in GENE-770-18-0692, *Safety Evaluation of Reconstitution of Quad Cities 1 Cycle 13 Fuel Bundle*, June 1991, and Attachment A to GENE-770-18-0692, *Quad Cities 1, Cycle 13 Reconstituted Bundle Description*, and Attachment B to GENE-770-18-0692, *Application of GESTR-Mechanical to Higher Exposure (NEDE-32091P)*.
3. In designating material as proprietary, General Electric utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.... A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information.... Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that disclosed a process, method or apparatus where protection of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
 - b. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
 - c. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
 - d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of General Electric, its customers or suppliers;

- e. Information which reveals aspects of past, present or future General Electric customer-funded development plans and programs of potential commercial value to General Electric;
 - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - g. Information which General Electric must treat as proprietary according to agreements with other parties.
5. Initial approval of proprietary treatment of a document is typically made by the Subsection manager of the originating component, who is most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis and such documents are clearly identified as proprietary.
 6. The procedure for approval of external release of such a document typically requires review by the Subsection Manager, Project manager, Principal Scientist or other equivalent authority, by the Subsection Manager of the cognizant Marketing function (or delegate) and by the Legal Operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside General Electric are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees, and then only with appropriate protection by applicable regulatory provisions or proprietary agreements.
 7. The document mentioned in paragraph 2 above has been evaluated in accordance with the applicable criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by General Electric.
 8. The document mentioned in paragraph 2 above is classified as proprietary because it contains details concerning current General Electric fuel designs which were developed at considerable expense to General Electric, which are not available to other parties.
 9. The information to the best of my knowledge and belief has consistently been held in confidence by the General Electric Company, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
 10. Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of the General Electric Company and deprive or reduce the availability of profit making opportunities because it would provide other parties, including competitors, with valuable information regarding current General Electric fuel designs which were obtained at considerable cost to the General Electric Company.

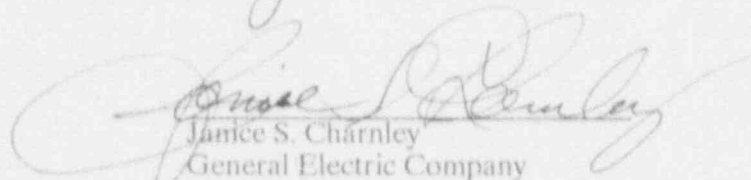
Affidavit

STATE OF CALIFORNIA)
COUNTY OF SANTA CLARA) ss:

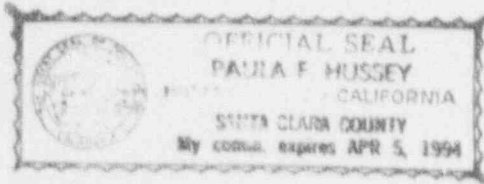
Janice S. Charnley, being duly sworn, deposes and says:

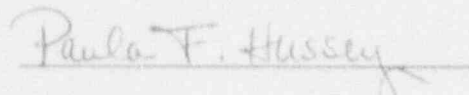
That she has read the foregoing affidavit and the matters stated therein are true and correct to the best of her knowledge, information, and belief.

Executed at San Jose, California, this 16th day of July 1992.


Janice S. Charnley
General Electric Company

Subscribed and sworn before me this 16th day of July 1992.




Notary Public - California
Santa Clara County

