James F. Klapproth
Manager, Engineering and Technology

Nuclear Services
General Electric Company
175 Curtner Avenue, MC 705, San Jose, CA 95125-1088
408 925-5434, Fax: 408 925-3837
james.klapproth@gene.ge.com

March 19, 2001

MFN- 01-010

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

Attention: Chief, Information Management Branch
Program Management
Policy Development and Analysis Staff

Subject: **Submittal of GE Proprietary Licensing Topical Report NEDC-33004P, "Constant Pressure Power Uprate"**

At a September 11, 2000 meeting with representatives of the NRC staff, GE discussed a revised approach to extended power uprate analyses which leverages the benefits of a power uprate with no increase to the normal operating reactor dome pressure. The enclosed Licensing Topical Report (LTR) documents the basis for this revised approach and is to be used by the NRC for reviewing all GE prepared BWR constant pressure power uprate supplemental safety analysis reports. NRC review and approval of this LTR is requested by year-end 2001 to support pending plant-specific submittals.

The streamlined approach documented in the LTR is a direct result of no increase to the normal operating reactor dome pressure and additional exclusions of changes not related to power uprate. In addition, previous power uprate experience, new generic evaluations and the standard reload fuel analysis process have been factored into the overall approach to minimize the required plant-specific documentation while maintaining a rigorous licensing and safety evaluation. This approach will be the basis for most of the future BWR power uprate applications and is termed Constant Pressure Power Uprate.

This report provides a systematic disposition of the engineering assessments required to support constant pressure power uprate applications up to 120% of the original licensed thermal power. These dispositions are divided into four basic categories:

1. **Generic Assessments** – those safety evaluations that can be dispositioned by a bounding analysis or by demonstrating that there is negligible effect due to the constant pressure power uprate.

2. **Cycle Dependent Reload Analysis Evaluations** – those evaluations that are fuel cycle dependent and required to be performed as part of the fuel reload licensing process.

3. **Operational Assessments** – those assessments typically associated with normal power operation and not directly associated with plant safety analyses, design bases as defined by 10 CFR 50.2 or required for the mitigation of design basis accidents.

4. **Plant-Specific Evaluations** – the remaining assessments not covered by one of the above categories. These evaluations will confirm key plant-specific power uprate aspects such as LOCA and containment response.

1/4
TOM
add: Bob Pulsifer
paper copy

Appendix A to the LTR provides the constant pressure power uprate supplemental safety analysis report shell. This shell provides the basis for future utility constant pressure power uprate submittals. The combination of the supplemental safety analysis report and the base LTR is consistent with the approach approved by the NRC for cycle-specific reload fuel licensing.

Please note that the attachment contains proprietary information of the type that GE maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GE as indicated in the attached affidavit. GE hereby requests that this information be withheld from public disclosure in accordance with the provision of 10 CFR 2.790.

Sincerely,

J.F. Klapproth, Manager
Engineering and Technology
GE Nuclear Energy
(408) 925-5434
james.klapproth@gene.ge.com

Attachments:

1. Affidavit by George B Stramback, dated March 9, 2001.
2. NEDC-33004P, "Constant Pressure Power Uprate Licensing Topical Report", March 2001

Cc: R.M. Pulsifer (NRC)
I. Nir (GE)
G.A. Watford (GNF-A)