



Caldon, Inc.

February 12, 2002

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Re: NRC Review of Caldon Engineering Report: ER-262

Gentlemen:

As part of Caldon's effort to keep the NRC apprised of pertinent information and developments related to measurement uncertainty recapture (MUR) power uprates, Caldon recently provided to the NRC a copy of "Caldon Engineering Report: ER-262, Effects of Velocity Profile Changes Measured In-Plant on Feedwater Flow Measurement Systems."¹ We understand that, in this context, NRC review of the report would be facilitated by arranging for Caldon to pay fees associated with the NRC's review. Accordingly, by this letter Caldon acknowledges its agreement to pay reasonable NRC review fees associated with the report's review by the NRC.

By way of background, ER-262 describes recently identified in-plant data that may have a bearing on the sensitivity and accuracy of different feedwater flow measurement techniques, including ultrasonic flow measurement devices used in MUR power uprates (see RIS 2002-03, "Guidance on the Content of Measurement Uncertainty Recapture Power Uprate Applications," January 31, 2002). Specifically, ER-262 describes unanticipated velocity profile changes in nuclear plant feedwater piping at various pipe locations and the potential effects of those changes on MUR power uprates.

As discussed in ER-262, Caldon has evaluated the implications of this topic for the Caldon LEFM✓ and LEFM✓+ chordal instruments used in uprate applications and communicated its determinations to its customers and potential customers. However, a generic NRC review of the analyses in ER-262 could serve the overall process of MUR uprate reviews since it addresses common, generic hydraulic issues that affect all flow measurement instruments.

Please contact me if you need further information related to establishing the fee mechanism or if you have any other questions.

Sincerely,

Calvin R. Hastings
President and CEO

Cc: Mr. John A. Zwolinski
Mr. John S. Cushing

4601
Add: Jack Cushing

¹ This report was submitted to the NRC by letter dated January 10, 2002, to Mr. John A. Zwolinski, Director, Division of Licensing Project Management (see ADAMS ML020220194 (transmittal letter) and ML020220204 (report)).