



FRAMATOME ANP

An AREVA and Siemens company

FRAMATOME ANP, Inc.

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Document Control Desk
ATTN: Chief, Planning, Program and Management Support Branch
U.S. Nuclear Regulatory Commission
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Clarification of Safety Evaluation for EMF-2310(P(A)) "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors"

Ref.: 1. EMF-2310(P(A)), *SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors*, May 2001

The following statement is made in the Safety Evaluation (SE) for the Reference 1 topical report:

The individual applicant must still provide justification for the specific application of the code which is expected to include as a minimum, the nodalization, defense of the chosen parameters, any needed sensitivity studies, justification of the conservative nature of the input parameters, and calculated results.

The Framatome ANP acceptance of the SE statement was based on our understanding that the justification would be provided in the documentation for each specific plant. This documentation is available for audit by the NRC. Recent interactions between the NRC and licensees who are using the Reference 1 methodology indicate that some NRC individuals have interpreted this statement to require the submittal of this information to the NRC the first time the methodology is applied to an event. Framatome ANP believes this is an inappropriate interpretation and is in conflict with the concept of the acceptance of a topical report. Framatome ANP requests NRC concurrence with the initial understanding of the SER; namely, that this justification process be properly documented in the calculation files developed to support licensee reloads and not be submitted as part of license amendment requests.

The purpose of a topical report is to minimize the time and resources that both the industry and the NRC expend on repetitive reviews of the same topic by providing for a single review and acceptance of the specified methodology and criteria. Framatome ANP submitted the topical report in Reference 1 so that future reviews would not be required. A requirement to submit information for each plant to which the methodology is used negates the benefits of the topical report approval process. Not only does the suggested approach of making repeated submittals render the topical report process useless or of limited value, it raises serious questions about the NRC's perception about the integrity of the vendor in meeting the requirements of an SE.

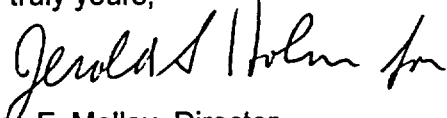
None of the topical reports submitted by Framatome ANP prior to or subsequent to the Reference 1 topical report contain such a requirement for submittal. Based on Framatome ANP's knowledge of topical reports submitted by Framatome ANP and other vendors, we

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believe that this requirement for individual submittals is highly unusual and is unique for an SE that is considered "clean case." A number of topical reports contain similar wording that require that certain evaluations be documented and maintained for audit by the NRC, and Framatome ANP fully complies with this mandate.

In accordance with our understanding of this specific SE, we have developed documentation on each topic, as appropriate, and a summary of this information is attached. Framatome ANP will continue its practice of providing full documentation of plant-specific justifications as called for in the SE. As stated earlier, Framatome ANP requests NRC concurrence with its interpretation of the statement in the SE. A response will be appreciated as soon as practicable to facilitate the approval of the license amendment requests submitted by our customers, but certainly by January 15, 2003.

Very truly yours,



James F. Mallay, Director
Regulatory Affairs

Enclosures

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**Information Documented by Framatome ANP
in Accordance with the SE on EMF-2310(P)(A)**

Nodalization

A process to define the nodalization for a particular plant is provided in the analyses guidelines. The process is consistent with the benchmarks and sample problem provided in the topical report. The specific nodalization for a plant is included in the calculation files.

Defense of the Chosen Parameters

The process by which the parameters are defined is provided in the analyses guidelines. The specific input parameters are consistent with or conservative relative to the plant configuration and are documented in the calculation file.

Needed Sensitivity Studies

The documentation of any needed sensitivity studies for a plant specific application are documented in the calculation file for the specific plant. In the applications of the topical report performed to date, no plant specific sensitivity studies have been required.

Justification of the Conservative Nature of the Input Parameters

The justification for the input parameters that are treated conservatively is provided in the topical report. The approach defined in the topical report is to define most parameters on a nominal basis. Those parameters, which are to be set conservatively, are identified in the topical report. If any additional parameters are treated conservatively, the documentation is provided in the calculation files for the specific plant.

Calculated Results

The calculated results are provided in the plant specific calculation files and the analyses report provided to the customer.