



**FRAMATOME ANP**

An AREVA and Siemens company

**FRAMATOME ANP, Inc.**

January 10, 2003  
NRC:03:002

PROJ 728

Mr. Jared Wermiel  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

**Completion of Commitments Associated with 1997 Engineering Inspection**

- Ref.: 1. Letter, J. F. Mallay (Framatome ANP) to S. J. Collins (NRC), "Completion of Commitments Associated with 1997 Engineering Inspection," NRC:03:001, January 10, 2003.
- Ref.: 2. Letter, J. F. Mallay (Siemens Power Corporation) to Gregory C. Cwalina (NRC), "Commitments Related to Code Documentation," NRC:99:017, April 29, 1999.

Dear Mr. Wermiel:

Framatome ANP informed Mr. Samuel J. Collins that the commitments stemming from the 1997 engineering inspection were completed in 2001 (see Reference 1). This letter to Mr. Collins states that certain implementation activities are being completed. The ongoing activities are summarized in the following text.

Framatome ANP (as Siemens Power Corporation) originally committed to perform a Verification and Validation (V&V) of the FLEX computer code, which is used in the safety analysis of BWR units. In 1999, we decided it would be more efficient to replace FLEX by EXEM/BWR-2000, a methodology that was approved by the NRC in 2001, than to proceed with this particular V&V effort. The elimination of certain V&V work in favor of using enhanced codes was explained to the NRC and was confirmed in Reference 2. Since its approval, EXEM/BWR-2000 has been used for all new BWR safety analyses.

For existing analyses, however, it has been necessary to make a logical transition from the use of FLEX results to the exclusive use of EXEM/BWR-2000. For example, the analysis of record for several plants is based in part on FLEX results. Since LOCA analyses using FLEX are consistently conservative relative to those from EXEM/BWR-2000, it was not imperative that this transition take place immediately.

To ensure sound management of this transition process from FLEX to EXEM/BWR-2000, a condition report has been developed. Further, the condition report has been classified as a non-conformance and specifies all the actions necessary to complete the transition and the

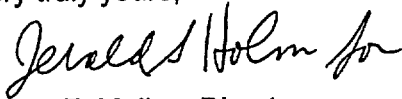
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schedule on which these actions will be taken. The condition report contains the following actions, restrictions, and schedules.

- New analyses will be performed by December 2004 for all plants whose analysis of record is still based on FLEX, except for one plant that is scheduled to be completed in 2005.
- FLEX may be used to address "emergency" applications where an owner needs to make a plant modification and to verify the acceptability of this change. If FLEX is used in this manner, EXEM/BWR-2000 will be used to complete a new analysis within nine months after the FLEX analysis is completed.
- FLEX may be used to conduct operability assessments associated with the requirements of 50.46 to estimate the effect on PCT of errors. This use of FLEX is consistent with 50.46 as a method to make PCT estimates.
- Previous FLEX results may be used as boundary conditions for reload heatup calculations, as necessary, until December 2005.

In summary, Framatome ANP is pleased to report that these actions will conclude our commitments to the NRC associated with the 1997 engineering inspection.

Very truly yours,



James F. Mallay, Director  
Regulatory Affairs

cc: G. M. Holahan  
D. G. Holland  
Project 728