

March 11, 2003

Mr. James F. Mallay
Director, Regulatory Affairs
Framatome ANP, Richland, Inc.
2101 Horn Rapids Road
Richland, WA 99352

SUBJECT: CLARIFICATION OF SAFETY EVALUATION FOR EMF-2310(P)(A), "SRP
CHAPTER 15 NON-LOCA METHODOLOGY FOR PRESSURIZED WATER
REACTORS" (TAC NO. MB6863)

Dear Mr. Mallay:

By letter dated November 11, 2002, Framatome ANP requested a clarification of the language contained in the staff's safety evaluation (SE) dated May 11, 2001, that approved the subject topical report. Specifically, Framatome requested that the NRC concur with the interpretation that the justification process need only be documented in the calculation files developed to support plant reloads and not submitted with the plant-specific license amendment requests that reference EMF-2310(P)(A).

The staff has reviewed the request and concludes that it cannot agree with the Framatome ANP clarification. The staff believes that while reference design calculations provide insight into the ability of the code to properly function, it provides little information on the use of the codes on a plant-specific basis. In accepting the code for regulatory use, the staff expected that each licensee would demonstrate that application of the code was within the design limitations of the code approval prior to inclusion in the Updated Final Safety Analysis Report (FSAR). As you know, this will not require submittal of the information until the conclusion of the refueling outage in which the change occurs. Providing this information is only required the first time that EMF-2310(P)(A) is applied for a specific accident/transient scenario on a given plant. In light of the confusion about the level of detail expected, the staff is clarifying its expectations for the submittal of material when EMF-2310(P)(A) is used for regulatory applications as follows:

Nodalization - In the May 11, 2001, SE, the staff expected licensees to submit the nodalization diagram and explain any differences from the nodalization used for the reference demonstration plant. The staff has reconsidered its position. The staff will now accept submittal of the specific guidelines used to develop the plant-specific nodalization. Deviations from the reference plant must be described and defended.

Chosen Parameters, Sensitivity Studies, and Conservative Nature of Input Parameters - In the May 11, 2001, SE, the staff expected licensees to submit and justify plant-specific values used in the analyses. The staff will now accept a table that contains the plant-specific parameters and the range of values considered for the selected parameter during the topical report approval review process. When plant-specific parameters are outside the range used in demonstrating acceptable code performance, the licensee will submit sensitivity studies to show the effects of that deviation.

Calculated Results - The staff continues to believe that licensees using the approved topical report must submit the results of the analyses to the staff. The licensee should submit the results of plant-specific analyses prior to incorporating them into their UFSARs.

Please add this clarification to the approved version of the topical report.

In summary, the staff cannot accept the interpretation submitted by Framatome ANP. The staff's information needs are as stated above. Submittal of a checklist for the staff's information which addresses the issues above will permit the staff to confirm that the plant-specific application proposed by the licensee is consistent with the approved methodology. We believe that our clarification will eliminate any confusion of licensees referencing the subject topical report.

With regard to your comment: "... this requirement for individual submittals is highly unusual and is unique for an SE that is considered a "clean case"." The staff has made requirements like this in the past. Submittal of this information regarding implementation of CASMO4 and SIMULATE3 at two plants recently is an example. We believe that the approach delineated in the staff's SE does not result in repeated submittals from licensees which render the topical report process useless or of limited value, and raise questions about the integrity of the vendor.

If you have any questions on the above, please contact Drew Holland at 301-415-1436.

Sincerely,

/RA/

Herbert N. Berkow, Director
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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*For previous concurrences see attached ORC

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