GE Nuclear Energy

Nuclear Services
175 Curtner Ave M/C 747
San Jose, CA 95125
(408) 925-1913, Fax (408) 925-6710
E-mail george stramback@gene ge com

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U.S Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20852-2738

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

Subject: **TPO - Changes to the TLTR (TAC No. MA9537)**

By Reference 1, GE Nuclear Energy submitted Revision 1 of the Thermal Power Optimization (TPO) Licensing Topical Report (TLTR), NEDC-32938P. Representatives of the NRC and GE discussed changes to the content of the TLTR to ensure that the conditions of the expected Safety Evaluation are addressed by future plant-specific TPO Safety Analysis Reports (TSAR).

GE agrees to revise the TLTR to require the following information to be included in future TSARs:

1. Additional supplemental justifications, evaluations or analyses to support the fuel-dependent topics of evaluation if a non-GE fuel supplier is involved (TLTR Section 4.2.3).

2. The evaluation of an operational Isolation Condenser System, if applicable (TLTR Section 5.6.7).

3. A confirmation that the plant-specific design and operating conditions for applicable I&C systems and components are consistent with those used for generic TPO evaluations. (TLTR Sections 5.8)

4. The performance characteristics of the flow monitoring instrumentation (TLTR 5.8).

5. Verification that the plant-specific margin between the Turbine Control Valve operating point and its steam flow capability at its maximum stroke (i.e., valve wide open) is adequate to maintain the current dome pressure operating limits at the uprated TPO conditions (TLTR C.2.2(2))

6. A plant-specific evaluation of the loss of feedwater event if the Level 1 setpoint can not be avoided and the plant has previously implemented a power uprate (TLTR E.2.2(4)).

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Enclosed are proposed TLTR pages that will be used to develop a future TLTR revision.

The generation of a plant-specific TSAR is based on a generic production TSAR template. The template, in part, identifies plant-specific activities that are not within the scope of GE analysis and are the scope of responsibility of the utility. GE agrees to modify the production TSAR template to ensure that future TSARs confirm that plant-specific programs and procedures are in place to:

a. Monitor and maintain instrument calibration during normal plant operation to assure that the instrument uncertainty is not greater than the uncertainty used in the licensee's analysis to justify the TPO-based power uprate up to 101.5 percent of the licensed current power level;

b. Control the software and hardware configuration of associated instrumentation;

c. Perform corrective actions (where required) to maintain instrument uncertainty within limits;

d. Report deficiencies of associated instruments to the manufacturer; and

e. Receive and address manufacturer deficiency reports.

The revisions to both the TLTR and the production TSAR template to reflect the above will be issued following the issuance of the TPO Safety Evaluation.

If you have any questions, please contact, Mike Lalor at (408) 925-2443 or myself.

Sincerely,

George Stramback
Regulatory Services, Project Manager
GE Nuclear Energy
(408) 925-1913
george.stramback@gene.ge.com

Project No. 710

Reference:

1. MFN 02-086, Letter from George Stramback (GE) to the NRC, November 5, 2002, *GE Proprietary Licensing Topical Report, NEDC-32938P, Revision 1, "General Electric Boiling Water Reactor Thermal Power Optimization"*, November 2002.

Enclosure:

1. Proposed TLTR Page Revisions

cc: AB Wang (NRC)
MA Lalor (GE/San Jose)
JF Klapproth (GE/San Jose)
I Nir (GE/San Jose)
ED Schrull (GE/San Jose)

ENCLOSURE 1

Proposed TLTR Page Revisions