



**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  
Washington, D.C. 20555-0001

**Topical Report BAW-2241(P), Revision 2, Appendix G, "Fluence and Uncertainty Methodologies."**

- Ref.: 1. Letter, Framatome ANP to NRC, "Submittal of BAW-2241(P), Revision 2, Appendix G, "Fluence and Uncertainty Methodologies," June 2, 2003.
- Ref.: 2. Letter, NRC to Framatome ANP, "Topical Report BAW-2241(P), Revision 2, "Fluence and Uncertainty Methodologies" (TAC No. M98692)," August 13, 2003.

Framatome ANP (FANP) requested NRC review and approval of the topical report BAW-2241(P), "Fluence and Uncertainty Methodologies" in Reference 1. The NRC determined that it could not conduct the requested review without some specific bench-marking studies. This decision was spelled out in a letter (Reference 2) that suggested a path to gain review and approval of the proposed methodology. We appreciate this direction.

FANP has initiated action to address the issues raised by the NRC, but one item requires clarification to prevent unnecessary duplication of work. In addition, brief comments are offered on three other suggestions provided by the NRC. All of these matters are included in the attachment to this letter.

Very truly yours,

James F. Mallay, Director  
Regulatory Affairs

enclosure

cc: D.G. Holland  
Project 728

T010

## Attachment 1

The NRC suggested that the following items be addressed to gain review and approval of the methodology in BAW-2241. Following is one clarification of our intended action and three comments.

- Provide a comparison to NUREG-6115's "PWR and BWR Pressure Vessel Fluence Calculation Benchmark Problems and Solutions," BWR benchmark problem.

### Comment

FANP will provide a comparison to NUREG-6115 for the BWR benchmark problem by June 30, 2004.

- Provide a comparison to the most suitable case in the pool critical assembly experiment.

### Clarification

FANP believes it has evaluated the most suitable cases in the Pool Critical Assembly (PCA) experiment. Section G.2.1 of Reference 1 discusses the PCA blind test and the results which were supervised by the Oak Ridge National Laboratory. Two PCA configurations (12/13 and 8/7) were benchmarked during the blind test program and the results are reported in NUREG/CR-1861. BAW-2241P-A contains the NUREG measurements and the FANP predictions on page A-15. These two configurations are believed to be adequately representative of both BWR and PWR conditions.

- Provide a plant-specific analysis of an existing capsule.

### Comment

This analysis will be performed following the award of a contract for analyzing BWR surveillance capsules.

- On the basis of the above, request NRC approval for a plant-specific analysis of another capsule of the same plant.

### Comment

This analysis will be performed following the award of a contract for analyzing BWR surveillance capsules.