



## GE ENERGY

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### *GE Proprietary Information*

MFN 05-091  
September 15, 2005

U.S Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555-0001

**Subject: Comments on the Draft Safety Evaluation (SE) Regarding Removal of Methodology Limitations for NEDC-32983P-A, "General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluation" (TAC NO. MC3788)**

In Reference 1, the NRC requested GE to identify any information contained in the draft SE, which is proprietary to GE, and to provide any clarifying comments. Enclosure 1 identifies the draft SE information which GE considers proprietary. Enclosure 2 identifies two clarifications for the draft SE.

GE requests that the information identified in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17. The affidavits previously submitted to the NRC address the basis for the proprietary determinations of the information, which now appears in the draft SE, as marked up in Enclosure 1. Those affidavits state that the information, which now appears in the draft SE, as marked up in Enclosure 1, has been handled and classified as proprietary to GE.

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

Sincerely,

A handwritten signature in cursive script that reads "George Stramback".

George Stramback  
Manager, Regulatory Services

Project No. 710

References:

1. MFN 05-090, Letter from Robert Gramm (NRC) to George Stramback (GE), *Draft Safety Evaluation (SE) Regarding Removal of Methodology Limitations for NEDC-32983P-A, "General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluation" (TAC NO. MC3788)*, dated September 1, 2005,

Enclosures:

1. Excerpts from Draft SE Regarding NEDC-32983P-A - Proprietary
2. Clarifying Comments Regarding the Draft SE - Non-proprietary

cc: MJ Colby (GNF/Wilmington)  
MB Fields (NRC)  
JF Harrison (GE/Wilmington)  
JF Klapproth (GE/Wilmington)  
MA Lalor (GE/San Jose)  
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eDRF 0000-0012-4185

**ENCLOSURE 2**

**MFN 05-091**

**Clarifying Comments Regarding the Draft SE**

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Enclosure 2

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The following clarify comments address the draft NRC Safety Evaluation (SE) issued in NRC letter dated September 1, 2005 (MFN 05-090).

**Comment 1, Page 2, Limitation (1) of draft NRC SE:**

GE recommends that the statement "GE incorporated the additional four data points into its data base." be revised as follows:

"GE incorporated the additional six data points (one data point each from three of the four additional capsule calculations and three data points from the fourth capsule calculation) into its data base."

**Comment 2, Page 4, Limitation (5) of draft NRC SE:**

Is this limitation for future calculated/measured (C/M) comparisons? The new C/M comparisons GE performed so far are consistent with the NEDC-32983P fluence methodology and, therefore, are not applicable to this limitation.

## **ENCLOSURE 1**

**MFN 05-091**

**Excerpts from Draft SE Regarding NEDC-32983P-A**

### **GE Proprietary Information**

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GE proprietary information is identified by a double underline inside double square brackets. In each case, the superscript notation<sup>(3)</sup> refers to Paragraph (3) of the affidavit provided in the previously provided affidavits, which documents the basis for the proprietary determination. [[This sentence is an example,<sup>(3)</sup>]] Specific information that is not so marked is not GE proprietary.