



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

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

Subject: Comments on Draft Safety Evaluation For Global Nuclear Fuel (GNF) Topical Report (TR) NEDE 33214P, "Densification Testing" (TAC NO. MC8679)

The GNF technical staff and NRC reviewers have reached a mutually acceptable statement relative to one of the suggestions in the draft SE comments transmitted by Reference 1. Enclosure 1 provides the final agreed upon statement.

This does not change the determination in the Reference 1 letter that there is no information in the SE that is GNF proprietary pursuant to the 10CFR2.390 criteria.

If you have any questions about the information provided here, please contact me at (910) 675-5954 or Mark Dubecky at (910) 675-6680.

Sincerely,

Andrew A. Lingenfelter
Manager, Engineering

Global Nuclear Fuel – Americas, LLC

Project No. 712

References

1. A. Lingenfelter (GNF) to USNRC Document Control Desk , Subject: Comments on Draft Safety Evaluation For Global Nuclear Fuel (GNF) Topical Report (TR) NEDE 33214P, "Densification Testing" (TAC NO. MC8679), August 29, 2006.

Enclosures

1. Final Agreed Upon Comment

cc: MA Dubecky, GNF/Wilmington
RE Brown, GE/Wilmington
JF Harrison, GE/Wilmington
JF Klapproth, GE/Wilmington
GB Stramback, GE/San Jose
MC Honcharik, USNRC
eDRF Section 0000-0057-8972

ENCLOSURE 1

FLN-2006-028

**FINAL AGREED UPON COMMENT ON DRAFT SAFETY EVALUATION
FOR GNF TOPICAL REPORT NEDE 33214P**

Section	Paragraph	Change	Justification
4.0	1	<p>From: Based on the review, the NRC staff requires that GNF continue the established monitoring program to assure that the pellet density requirements are met using a qualified measurement technique on 100 percent of pellet lots. Figure 1 in TR NEDE-33214P depicts the fuel density requirements that will prompt corrective actions for out-of-specification pellets. Any changes in the limits of Figure 1 in TR NEDE-33214P will require a prior approval by the NRC staff.</p> <p>To: Based on the review, the NRC staff requires that GNF continue the established monitoring program to assure that the pellet density requirements are met using a qualified measurement technique on 100 percent of pellet lots. Figure 1 in TR NEDE-33214P depicts the fuel specification limits for pellet density. Any changes to the density specification limits relative to Figure 1 in TR NEDE-33214P which will decrease the nominal pellet density will require prior approval by the NRC staff.</p>	<p>GNF requests that NRC approval be required only for changes to the nominal pellet density that will negatively affect pellet densification. That is to say that only a decrease in the nominal pellet density, relative to Figure 1 in the submittal, would require approval from the NRC staff. An increase in the nominal pellet density would decrease the propensity of the fuel to densify in-reactor and therefore would not result in a failure for pellet densification.</p> <p>The risk for fuel densification failures results from decreasing the nominal pellet density.</p>