



## GE ENERGY

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**Subject: Commitment for a TRACG ATWS LTR**

By Reference 1, GE submitted Revision 2 of the NEDC-33006P, "Maximum Extended Load Line Limit Plus" (MELLLA+). Section 9.3.1 of NEDC-33006P states that the evaluation of anticipated transients without a scram (ATWS) will be performed using ODYN (licensing calculation) as well as a best estimate TRACG analysis for those plants that depressurize prior to achieving hot shutdown.

GE proposed the use of TRACG as a best estimate ATWS evaluation because TRACG can handle depressurization scenarios, which is not part of the current licensed method. Note, TRACG is already NRC approved for the short-term overpressure portion of the ATWS event. GE now desires to use TRACG as the sole ATWS licensing evaluation code replacing ODYN ATWS evaluations for all ATWS acceptance criteria for future applications, including MELLLA+ and, therefore, will submit a TRACG ATWS LTR. GE anticipates the TRACG ATWS LTR will be submitted by December 2008.

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

Sincerely,

Robert E. Brown  
General Manager, Regulatory Affairs

Project No. 710

DO65

Reference:

1. GE letter, LM Quintana (GE) to NRC, MFN 05-141, "GE Licensing Topical Report NEDC-33006P, Revision 2, "Maximum Extended Load Line Limited Plus", dated November 28, 2005

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