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MFN 06-348 Supplement 2

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**Subject: Response to Portion of NRC Request for Additional  
Information Letter No. 33 - TRACG Nodalization for  
Containment Analyses - RAI Number 6.2-52 S01**

Enclosure 1 contains the GE Hitachi Nuclear Energy (GEH) response to the subject NRC RAI originally transmitted via the Reference 1 letter and supplemented by an NRC request for clarification in Reference 2.

If you have any questions or require additional information, please contact me.

Sincerely,

James C. Kinsey  
Vice President, ESBWR Licensing

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References:

1. MFN 06-167, Letter from U.S. Nuclear Regulatory Commission to David Hinds, *Request for Additional Information Letter No. 33 Related to ESBWR Design Certification Application*, June 1, 2006
2. E-Mail from Shawn Williams, U.S. Nuclear Regulatory Commission, to George Wadkins, GE Hitachi Nuclear Energy, dated May 25, 2007 (ADAMS Accession Number ML071450269)

Enclosure:

1. MFN 06-348 Supplement 2 - Response to Portion of NRC Request for Additional Information Letter No. 33 - Related to ESBWR Design Certification Application - TRACG Nodalization for Containment Analyses - RAI Number 6.2-52 S01

cc: AE Cubbage USNRC (with enclosures)  
GB Stramback GEH/San Jose (with enclosures)  
RE Brown GEH/Wilmington (with enclosures)  
eDRF 0000-0069-5943

**Enclosure 1**

**MFN 06-348 Supplement 2**

**Response to Portion of NRC Request for**

**Additional Information Letter No. 33**

**Related to ESBWR Design Certification Application**

**TRACG Nodalization for Containment Analyses**

**RAI Number 6.2-52 S01**

**NRC RAI 6.2-52 S01:**

*In response to RAI 6.2-52, MFN 06-348, GE provided changes made to the NRC approved TRACG code. This response included a justification for the changes and the results of tie-back calculations. Regarding GE response to parts B and C of the request, GE stated that "[t]hese discussions will be included in the Supplement in DCD Section 6.2." Staff believes that the information quoted was incorporated into the DCD, Tier 2, Revision 3, Chapter 6, Appendix 6A, Table 6A-1, "Evaluation of TRACG Application Procedure." However, GE did not include a discussion of the justification including the results of the tie-back calculation for the changes to the approved TRACG code in the DCD. The justification for a change to the previously approved TRACG code is necessary to be incorporated into a licensing document either the DCD or as a supplement to the Topical Report.*

*Please provide the justification including the results of the tie-back calculations in the DCD or in a supplement to NEDC-33083P-A, "TRACG Application for ESBWR." If NEDC-33083P-A is supplemented, ensure that the supplement is referenced in the DCD.*

**GEH Response:**

The response to RAI 6.2-52 has been incorporated as Appendix 6B in DCD Tier 2, Revision 4. The justification including the results of the tie-back calculations included in Appendix 6B are consistent with the original response to RAI 6.2-52, MFN 06-348.

In addition, the following new last sentence in the second paragraph was added in DCD Tier 2, Revision 4, Subsection 6.2.1.1.3.1, to reference the new Appendix 6B:

"Appendix 6B provides the justification for the use of the DCD nodalization similar to that in Reference 6.2-1, as outlined in the first row of Table 6A-1), including the results of the tie-back calculations between these nodalizations."

**DCD Impact:**

The DCD changes described in the above response to this RAI were made in DCD Tier 2, Revision 4.