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Subject: NEDC-33173P - Commitments Regarding Gamma Scans (TAC No. MD0277)

As part of the review of NEDC-33173P (Reference 1), GEH made certain commitments to provide the data, including fuel scan data, to justify the applicability of its analytical methods to expanded operating domains. This letter clarifies GEH's commitment to obtain gamma scans.

Specifically, two letters, MFN 06-434 (Reference 2) and MFN 06-481 (Reference 3) constitute the commitments in this regard. FLN-2005-034 (Reference 4) does not provide commitments to obtain scans.

In MFN 06-434 (Reference 2), GEH documented its intent to engage in an ongoing qualification program to confirm the applicability of the pin power and assembly power uncertainties and to confirm, on a continuing basis, the acceptability of power distribution predictions to expanded operating domains. Specifically, GEH identified additional data it had obtained and committed to supplement the Methods LTR with the analysis of the scans to justify the removal of the adders to the SLMCPR, imposed by the NRC, to address uncertainties in analytical methods within the expanded operating domains.

In response to RAI 9 in GEH Letter MFN 06-481 (Reference 3), GEH agreed that a limitation would be placed in the NRC Safety Evaluation of NEDC-33173P (Methods LTR) that would require submittal of plenum fission gas and fuel exposure gamma scans for NRC review as part of licensing review of a revision in GEH's thermal-mechanical methodology. Subsequently, the NRC issued the SE with Limitation 12. GEH committed to submit plenum fission gas and fuel exposure gamma scans to the NRC.

Separately, FLN-2005-034 (Reference 4) transmitted a broad ranging presentation on gamma scans made to the NRC on October 26, 2005. The presentation highlighted current activities in the area of gamma scans, explained purpose and process, and discussed intended plans. The content, including the plans for obtaining scans, was provided as an open exchange of information. Performing gamma scans at plant sites requires the agreement of and considerable coordination with the utility before and during outages. Consequently, firm schedules and locations for performing the scans are difficult to establish.

The listing of scans included in FLN-2005-034 was not intended as a GEH or GNF commitment. The commitments for GEH scans are documented in the aforementioned letters, MFN 06-434 and MFN 06-481.

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

Sincerely,

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Project No. 710

References:

1. NEDC-33173P, "Licensing Topical Report, Applicability of GE Methods to Expanded Operating Domains," February 2006.
2. GEH Letter, "Updated Response to RAI 28-2 - NEDC-33173P," MFN 06-434, November 22, 2006.
3. GEH Letter, "Responses to RAIs 7, 8, 9, 10, and 11 - NEDC-33173P," MFN 06-481, December 5, 2006.
4. GNF Letter, "Recent Experimental Thermal Hydraulic and GNF2 Licensing Meeting, October 26-27, 2005," FLN-2005-034, December 15, 2005.

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