



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

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**Subject: Confirmation of Approach Documented in NEDE-24011-P-A-16 “General Electric Standard Application for Reactor Fuel (GESTAR II)”**

The purpose of this letter is to provide clarity regarding the exposure points to be used in the determination of the Safety Limit MCPR. Section 1.1.5, Safety Limit MCPR, of GESTAR II states:

- A. A cycle-specific Safety Limit MCPR will be calculated on a cycle-specific basis following the steps in 1.1.5.B.
- B. vii. Analyses are performed for multiple exposure points throughout the cycle. Typically the most limiting value is applied over the entire cycle, but exposure-dependent values may be applied.

Further, the TER in the SER approving Amendment 25 to GESTAR II that established the cycle specific SLMCPR states: “The cycle-specific analysis is performed at multiple exposure points throughout the cycle, and either the most limiting or an exposure-dependent SLMCPR is used in determining the Operating Limit MCPR (OLMCPR).”

The Amendment 25 RAI responses presented SLMCPR analyses at BOC, PHE and EOC and sometimes at MOC instead of PHE. While the GESTAR II statements regarding the selection of exposure points is general, there is a potential for confusion because the RAIs specified BOC, PHE and EOC exposure points. It is possible to make the interpretation that the cycle specific SLMCPR analysis must be performed at these specific exposure points.

This letter documents the GNF position that GESTAR II licensing basis is to perform SLMCPR analysis at “multiple exposure points throughout the cycle” and the determination of the specific

multiple exposure points to be used is not dictated by the Amendment 25 RAIs performed at BOC, PHE and EOC. The technical activity is dictated by selecting adequate exposure points (at least a minimum of three) that will establish the SLMCPR trend through the cycle to ensure that if the most limiting SLMCPR value analyzed is applied over the entire cycle it would be reasonably bounding throughout the entire cycle.

If you have any questions about the information provided here, please contact me at (910) 819-5954 or Jim Harrison at (910) 819-6604.

Sincerely,



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**Document Components:**  
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