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U.S. Nuclear Regulatory Commission
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Subject: Implementation of MELLLA Plus Limitation 6 - NEDC-33006P (TAC No. MC1967)

By Reference 1, the NRC issued its Safety Evaluation (SE) regarding the GE Hitachi Nuclear Energy (GEH) Licensing Topical Report (LTR) NEDC-33006P. During subsequent phone calls with the NRC, GEH discussed its planned implementation of Limitation 6 documented in Section 12 of the SE. GEH understood from these discussions that the NRC agrees with GEH's proposed implementation as presented in the enclosure and that this letter should be referenced by the 'A' version of the NEDC-33006P.

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

Sincerely,

James F. Harrison
Vice President, Fuels Licensing
Regulatory Affairs
GE Hitachi Nuclear Energy

Project No. 710

Reference:

1. Letter TB Blount (US NRC) to RE Brown (GEH), Correction of Final Safety Evaluation for General Electric (GE)-Hitachi Nuclear Energy Americas, LLC (GEH) Licensing Topical Report (LTR) NEDC-33006P, "Maximum Extended Load Line Limit Analysis Plus," MFN 08-837, dated October 15, 2008.

Enclosure:

1. Implementation of MELLLA+ Limitation 6 - NEDC-33006P

cc:

MC Honcharik, NRC
SS Philpott, NRC
PT Tran, GEH/Vallecitos
JS Bowman, GEH/Wilmington
RE Brown, GEH/Wilmington
M Lalor, GEH/San Jose
eDRF Section 0000-0063-9451

ENCLOSURE 1

MFN 09-126

Implementation of MELLLA+ Limitation 6 - NEDC-33006P

By NRC letter dated October 15, 2008, the NRC issued its Safety Evaluation (SE) regarding GEH Licensing Topical Report (LTR) NEDC-33006P (M+ LTR). During subsequent phone calls with the NRC, GEH discussed its planned implementation of Limitation 6 documented in Section 12 of the SE. GEH understood from these discussions that the NRC agreed with GEH's planned implementation. The following summarizes the discussions.

GEH commented on the Final NRC Safety Evaluation in its letter dated May 4, 2007 (MFN 07-251). The NRC provided a resolution of the comments in the attachment to the final SE. The NRC's resolution of Comment 48 documents that the NRC accepts a CF uncertainty 'high enough to compensate for the difficulties associated with benchmarking.

During a call with the NRC on December 8, 2008, GEH discussed its understanding of Limitation 6 and the NRC's resolution of Comment 48 and agreed to implement Limitation 6 consistent with the documented resolution of GEH's comment as indicated below.

NRC Limitation 6 - SLMCPR Statepoints and CF Uncertainty (Section 2.2.1.1)

> Until such time when the SLMCPR methodology (References 40 and 41) for off-rated SLMCPR calculation is approved by the staff for MELLLA+ operation, the SLMCPR will be calculated at the rated statepoint (120 percent P/100 percent CF), the plant-specific minimum CF statepoint (e.g., 120 percent P/80 percent CF), and at the 100 percent OLTP at 55 percent CF statepoint. The currently approved off-rated CF uncertainty will be used for the minimum CF and 55 percent CF statepoints. The uncertainty must be consistent with the CF uncertainty currently applied to the SLO operation or as NRC-approved for MELLLA+ operation. The calculated values will be documented in the SRLR.

GEH Implementation

Reflecting the NRC's resolution of Comment 48, the Limitation reads:

> Until such time when the SLMCPR methodology (References 40 and 41) for off-rated SLMCPR calculation is approved by the staff for MELLLA+ operation, the SLMCPR will be calculated at the rated statepoint (120 percent P/100 percent CF), the plant-specific minimum CF statepoint (e.g., 120 percent P/80 percent CF), and at the low flow MELLLA+ boundary (e.g., 97 percent OLTP at 55 percent CF statepoint). . The higher CF and FWF uncertainties must be applied to the non-rated conditions, and should be high enough to compensate for the difficulties associated with benchmarking the reduced CF conditions. The plant-specific M+ application will document the justification for the uncertainties. The calculated values will be documented in the SRLR.

The methodology to determine the SLMCPR will be consistent with GEH letter dated August 24, 2004 (MFN 04-081). Each plant specific application would include a discussion and justification of the feedwater and core flow uncertainties. Table 2-4 of the

NRC's SE regarding MELLLA+ below documents the statepoints for which the SLMCPR will be calculated.

Table 2-4 SLMCPR Analysis Conditions for MELLLA+

Power (Percent Rated)[1]	Flow (Percent Rated)
120 percent	100 percent
120 percent	80 percent[2]
97 percent	55 percent

[1] or corresponding maximum allowable power level at the specified CF shall be used.

[2] or minimum MELLLA+ CF submitted in the license application.