



HITACHI

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MFN 09-143
February 27, 2009

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555-0001

Subject: NEDC-33173P - Implementation of Limitation 12 (TAC No. MD0277)

By Reference 1, the NRC issued its Safety Evaluation (SE) regarding the GE Hitachi Nuclear Energy (GEH) Licensing Topical Report (LTR) NEDC-33173P. Limitation 12 of that SE addresses the use of the PRIME T-M methods (Reference 2) for future license applications for extended power uprate (EPU) and MELLLA+ after PRIME and its applications are approved. During subsequent phone calls with the NRC, GEH discussed its planned implementation of Limitations 12.

Specifically, by June, 2009, GEH has agreed to issue a supplement to the GEH Licensing Topical Report, NEDC-33173P (IMLTR), describing the implementation of the PRIME code models into the downstream safety analysis codes. The supplement will provide: (1) identification of the specific codes and internal models to be upgraded, (2) any adaptations of the PRIME models to support its interface with each affected code, and (3) a description of the software testing and acceptance criteria to determine acceptable implementation. Further, the letter transmitting the supplement will include a schedule by which the upgrade to the downstream codes is completed.

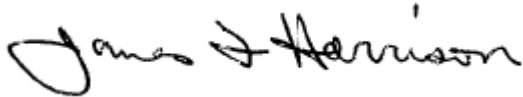
GEH understands that the NRC will conduct an audit once the implementation and testing is complete to confirm consistency with the approved process. The staff's audit report will be included as an attachment to the IMLTR or appendix to the IMLTR SER. GEH will implement PRIME and the related affected downstream codes upon issuance of the staff's audit report and incorporation into the IMLTR, or issuance of an appendix to the IMLTR SER.

Further, Limitation 12 documents GEH's commitment to provide plenum fission gas and fuel exposure gamma scans as part of the PRIME licensing review. Although GEH is committed to obtaining the necessary scans, GEH understands that the NRC will approve the PRIME code without these committed scans being available at this time. GEH

understands that the NRC expects future license applications for EPU and MELLLA+ will utilize PRIME and its application in downstream codes consistent with the aforementioned planned implementation without review of the committed fission gas and fuel exposure gamma scans.

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

Sincerely,



James F. Harrison
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GE Hitachi Nuclear Energy

Project No. 710

Reference:

1. NRC letter, Final Safety Evaluation for General Electric (GE)-Hitachi Nuclear Energy Americas, LLC (GHNE) Licensing Topical Report (LTR) NEDC-33173P, "Applicability of GE Methods to Expanded Operating Domains," MFN 08-089, dated January 17, 2008.
2. Letter from AA Lingenfelter (GNF) to Document Control Desk (USNRC), Subject: GNF Licensing Topical Report, "The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance," NEDC-33256P, NEDC-33257P, and NEDC-33258P, January 2007, FLN-2007-001, January 19, 2007.

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