



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

**Proprietary Notice**

This letter transmits proprietary information in accordance with 10CFR2.390. Upon removal of Enclosure 1, the balance of the letter may be considered non-proprietary.

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Vice President, Fuel Engineering**

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MFN 09-106 Supplement 2

August 11, 2009

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

**Subject: Response to Supplement To Request For Additional Information Re: Licensing Topical Reports NEDC-33256P, NEDC-33257P, and NEDC-33258P, "The PRIME Model For Analysis of Fuel Rod Thermal-Mechanical Performance" (TAC No. MD4114)**

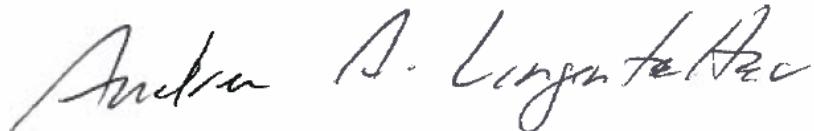
By Reference 1, the U.S. Nuclear Regulatory Commission (US NRC) staff provided a supplemental request for additional information regarding the PRIME Model for Analysis of Fuel Rod Thermal–Mechanical Performance. This letter provides responses for the supplemental PRIME RAIs including specific additional information requested at the June 30-July 1 audit.

Please note that Enclosure 1 contains proprietary information of the type that GNF maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GNF-A as indicated in its affidavit. The affidavit contained in Enclosure 3 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GNF-A. GNF-A hereby requests that the information in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10CFR2.390 and 9.17.

Enclosure 2 is a non-proprietary version of Enclosure 1.

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,



Andrew A. Lingenfelter  
Vice President, Fuel Engineering  
Global Nuclear Fuel–Americas, LLC

Project No. 712

#### References

1. Letter from SS Philpott (US NRC) to AA Lingenfelter (GNF), Subject: Supplement to Request for Additional Information Re: Licensing Topical Reports NEDC-33256P, NEDC-33257P, and NEDC-33258P, "The PRIME Model for Analysis of Fuel Rod Thermal-Mechanical Performance" (TAC No. MD4114), April 29, 2009.

#### Enclosures

1. Request for Additional Information Response for the PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance - GNF Proprietary Information
2. Request for Additional Information Response for the PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance – Non-Proprietary Information
3. Affidavit dated July 2009

cc: MC Honcharik, US NRC  
SS Philpott, US NRC  
PC Clifford, US NRC  
AA Lingenfelter, GNF/Wilmington  
JG Head, GEH/Wilmington  
eDRF Section 0000-0102-4737

#### Document Components:

- 001 MFN 09-106 Supplement 2 Cover Letter.pdf
- 002 MFN 09-106 Supplement 2 Enclosure 1 Proprietary.pdf
- 003 MFN 09-106 Supplement 2 Enclosure 2 Non-Proprietary.pdf
- 004 MFN 09-106 Supplement 2 Enclosure 3 Affidavit.pdf