

September 14, 2011

Mr. Jerald G. Head
Senior Vice President, Regulatory Affairs
GE-Hitachi Nuclear Energy Americas LLC
P.O. Box 780, M/C A-18
Wilmington, NC 28401-0780

SUBJECT: CLARIFICATION OF INTENT ON METHODOLOGIES FOR DEMONSTRATING
STEAM DRYER INTEGRITY FOR POWER UPRATE – GE-HITACHI NUCLEAR
ENERGY

Dear Mr. Head:

By letter dated February 22, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100541504), GE-Hitachi Nuclear Energy Americas LLC requested that the U.S. Nuclear Regulatory Commission (NRC) staff provide the technical basis for its position regarding a minimum alternating stress ratio for Boiling Water Reactor steam dryer analyses for power uprate. The requested rationale was provided in a letter to you on July 27, 2010 (ADAMS Accession No. ML101960147) that included a position paper.

Upon further review, the NRC staff found that certain wording in this position paper needed to be clarified to reflect our original intent. Please replace the July 27, 2010, version with the appropriate enclosures.

Please contact my staff, Steve Philpott at (301) 415-2365, if you have any further questions regarding this subject.

Sincerely,

/RA/

Robert A. Nelson, Deputy Director
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 710

cc w/ encl.1 only: See next page

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| Enclosure 2 transmitted herewith contains SUNSI. When separated from Enclosure 2, this transmittal document is decontrolled. |
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Enclosures:

1. Mechanical and Civil Engineering Branch/Division of Engineering Fatigue Analysis of Boiling Water Reactor Steam Dryers For Extended Power Uprate Conditions Rationale For Staff Position On Structural Integrity of Steam Dryers (PBLE Methodology or Method 2 for Operating Fleet), Revision 1 (non-proprietary version)
2. Mechanical and Civil Engineering Branch/Division of Engineering Fatigue Analysis of Boiling Water Reactor Steam Dryers For Extended Power Uprate Conditions Rationale For Staff Position On Structural Integrity of Steam Dryers (PBLE Methodology or Method 2 for Operating Fleet), Revision 1 (proprietary version)

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ADAMS ACCESSION NOs.: ML111450902 (package), ML111450645 (letter),
ML111450650 (enclosure 1), ML111450901 (enclosure 2)

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| NAME | SPhilpott | JRowley | DBaxley | MKhanna | JJolicoeur (BMiller for) | RNelson |
| DATE | 8/24/11 | 8/24/11 | 9/6/11 | 9/6/11 | 9/13/11 | 9/14/11 |

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