



**HITACHI**

**GE Hitachi Nuclear Energy**

**Proprietary Notice**

This letter transmits proprietary information in accordance with 10 CFR 2.390. Upon the removal of Enclosures 1 and 3, the balance of the letter may be considered non-proprietary.

**James F. Harrison**

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U.S. Nuclear Regulatory Commission  
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**Subject: Response to Request for Additional Information RE: GE-Hitachi Nuclear Energy Americas Topical Report (TR) NEDO-32465-A, Supplement 1, “Migration to TRACG04/PANAC11 from TRACG02/PANAC10 for Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications” (TAC No. ME7104) and DIVOM Process Screen Shots**

By Reference 1, the NRC requested additional information to support its review of NEDO-32465-A, Supplement 1, “Migration to TRACG04/PANAC11 from TRACG02/PANAC10 for Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications.” Enclosed are responses to all of the Reference 1 RAIs.

In addition, Enclosure 3 contains the step-by-step DIVOM process summarized with screen shots that was shown to the NRC reviewers during the audit conducted on September 29, 2011 for the Supplement 1 to NEDO-32465. This information was requested by the NRC reviewers in support of their audit.

Please note that Enclosure 1 contains proprietary information of the type that GEH maintains in confidence and withholds from public disclosure. The affidavit contained within Enclosure 4 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GEH. GEH hereby requests that the information in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17. Enclosure 2 is a non-proprietary version of Enclosure 1.

Because Enclosure 3 is proprietary in its entirety, a non-proprietary version is not provided.

If you have any questions, please contact Juswald Vedovi at (910) 819-6314 or me.

Sincerely,



James F. Harrison  
Vice President, Fuel Licensing  
Regulatory Affairs  
GE-Hitachi Nuclear Energy Americas LLC

Project No. 710

References:

1. Letter from S. S. Philpott (NRC) to J. G. Head (GEH), Subject: Request for Additional Information RE: GE-Hitachi Nuclear Energy Americas Topical Report (TR) NEDO-32465-A, Supplement 1, "Migration to TRACG04/PANAC11 from TRACG02/PANAC10 for Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications" (TAC No. ME7104), MFN 12-089, May 7, 2012.

Enclosures:

1. Response to NRC RAIs - NEDO-32465-A, Supplement 1 – GEH Proprietary Information – Class III (Confidential)
2. Response to NRC RAIs - NEDO-32465-A, Supplement 1 – Non-Proprietary Information – Class I (Public)
3. DIVOM Process Screen Shots - GEH Proprietary Information – Class III (Confidential)
4. Affidavit

cc: SS Philpott, NRC

JG Head, GEH Wilmington  
PL Campbell, GEH Washington  
AA Lingenfelter, GNF Wilmington  
eDRF Section 0000-0150-9529 R0

**Document Components:**

- 001 MFN 12-088 Cover Letter.pdf
- 002 MFN 12-088 Enclosure 1 Proprietary.pdf
- 003 MFN 12-088 Enclosure 2 Non-Proprietary.pdf
- 004 MFN 12-088 Enclosure 3 Proprietary.pdf
- 005 MFN 12-088 Enclosure 4 Affidavit.pdf