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GE Hitachi Nuclear Energy

Proprietary Notice

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

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MFN 12-124
November 7, 2012

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

Subject: Incorporation of Supplement 4 PRIME Implementation Audit Approval into NEDC-33173P-A, Revision 4

By Reference 1, the NRC issued the final Safety Evaluation for GE-Hitachi Nuclear Energy Americas LLC (GEH) Licensing Topical Report (LTR) NEDO-33173, Supplement 4, "Implementation of PRIME Models and Data in Downstream Methods." An accepted version of the LTR incorporating the Safety Evaluation was published in Reference 2.

As stated in Reference 1:

"At the conclusion of the code update and software testing process the NRC staff will audit the final documentation to ensure that the code updates were performed in accordance with the approved process described in Supplement 4."

The NRC conducted an audit of the PRIME implementation in downstream analysis codes on July 17-18, 2012. The NRC staff determined that the PRIME models had been correctly implemented. By Reference 3, the NRC issued a letter documenting the completion of the NRC staff's audit satisfying the condition stated above and in Reference 1.

NEDC-33173P-A has been updated to incorporate the Reference 3 letter. No other changes have been made to NEDC-33173P-A.

The NEDC-33173P-A Revision 4 LTR is structured as follows:

- The SE for NEDC-33173P Revision 2 and Supplement 2 Parts 1 – 3,
- The SE for NEDC-33173P Revision 0,
- The SE for NEDC-33173P Supplement 3,
- PRIME Audit Completion Letter (Reference 3)

The SE for NEDO-33173 Supplement 4,
The body of the LTR itself, NEDC-33173P-A Revision 4,
The Request for Additional Information (RAI) responses for NEDC-33173P Revision 0,
The RAI responses for NEDC-33173P Revision 2 and Supplement 2 Parts 1 – 3, and
The ACRS supplemental RAI responses.

Enclosure 1 contains proprietary information of the type that GEH maintains in confidence and withholds from public disclosure. The affidavit contained within Enclosure 3 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 the non-proprietary version of Enclosure 1.

If you have any questions, please contact me.

Sincerely,



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

Project No. 710

References:

1. Letter, RA Nelson (NRC) to JG Head (GEH), Subject: Final Safety Evaluation for GE Hitachi Nuclear Energy Americas Topical Report NEDO-33173, Supplement 4, "Implementation of PRIME Models and Data in Downstream Methods" (TAC No. ME1704), MFN 11-218, September 9, 2011.
2. Letter, JF Harrison (GEH) to NRC Document Control Desk, Subject: Implementation of PRIME Models and Data in Downstream Methods, NEDO-33173, Supplement 4-A, September 2011, MFN 11-219, September 23, 2011.
3. Letter, S Bahadur (NRC) to JG Head (GEH), Subject: NRC Audit of GE-Hitachi Nuclear Energy Americas Topical Report NEDO-33173, Supplement 4-A, "Implementation of PRIME Models and Data in Downstream Methods" (TAC No. ME9033), MFN 12-123, October 22, 2012.

Enclosures:

1. NEDC-33173P-A, Revision 4 – GEH Proprietary Information – Class III (Confidential)
2. NEDO-33173-A, Revision 4 – Non-Proprietary Information – Class I (Public)
3. Affidavit for Enclosure 1

cc: SS Philpott, US NRC
JG Head, GEH/Wilmington
PL Campbell, GEH/ Washington
BR Moore, GEH/Wilmington
PT Tran, GEH/Vallecitos
eDRF Section 0000-0141-4409 R2

Document Components:

001 MFN 12-124 Cover Letter.pdf
002 MFN 12-124 Enclosure 1 Proprietary.pdf
003 MFN 12-124 Enclosure 2 Non-Proprietary.pdf
004 MFN 12-124 Enclosure 3 Affidavit.pdf