



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Proprietary Notice

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

Andy Lingenfelter
Vice President, Fuel Engineering

Global Nuclear Fuel – Americas, LLC
Castle Hayne Road, Wilmington, NC 28401
(910) 819-5954 Fax: (949) 221-6961
Andy.Lingenfelter@gnf.com

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

**Subject: Amendment 37 to NEDE-24011-P-A-19 and NEDE-24011-P-A-19-US,
General Electric Standard Application for Reactor Fuel (GESTAR II) and the
US Supplement**

Amendment 37 contains an assortment of changes, some of which create a large number of changes in GESTAR II. The elimination of NEDE-31152P, *Global Nuclear Fuels Fuel Bundle Designs*, as a future requirement, causes the largest group of changes as this report was mentioned in numerous places. Further, the changes are complex because the referencing of this report is not fully eliminated for “older” fuel product lines. The following is a brief summary of the changes:

- Modified the references to NEDE-31152P, deleted NEDE-31152P as a future requirement, added a plant and cycle specific Fuel Bundle Information Report (FBIR) requirement, added the FBIR shell adjacent to the SRLR shell in Appendix A, and moved the core lattice table from NEDE-31152P to GESTAR II Section 1 Table 1-1.
- Added a new Section 1.4 listing the compliance report references for each fuel product line.
- Clarified the actions that a plant must take if the plant deviates from the generically analyzed Banked Position Withdrawal Sequence (BPWS) bank notch positions.
- Revised Section 3.5, Reactivity of Fuel in Storage, to make the section more clear with respect to the analysis bases and to update the analyses that support the in-core k_{∞} limits. New analyses were performed to meet the current NRC expectations for rack criticality analyses.
- Added end-of-cycle coastdown for reloads analyzed with TRACG.
- Incorporated SAFER/PRIME into the US Supplement Section S.2.2.3.2, Loss-of-Coolant Accident, removed SAFE/REFLOOD as a LOCA evaluation methodology, and removed the SAFER/GESTR report list and associated references.

This set of GESTAR II changes, while not challenging technically, are complex logically. As such, GNF proposes a kickoff meeting with the NRC Staff after the Staff has some time to become familiar with the changes. In this way we can talk through all of the changes and enhance understanding.

GNF requests that the NRC review and approve the enclosed amendment to GESTAR II. GESTAR II is applied to all BWR plants for which GNF provides reload fuel and licensing. The material in this amendment largely represents changes in the way GNF prefers to handle fuel information and cleanup of other documentation. As soon as this amendment is approved, it will be used by the entire BWR fleet that is loading GNF fuel.

Please note that Enclosure 1 contains proprietary information of the type that GNF-A maintains in confidence and withholds from public disclosure. 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 10 CFR 2.390 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

Enclosures

1. Amendment 37 to GESTAR II – GNF-A Proprietary Information – Class III (Confidential)
2. Amendment 37 to GESTAR II – Non-Proprietary Information – Class I (Public)
3. Affidavit

cc: SS Philpott, USNRC
PL Campbell, GEH/Washington
JG Head, GEH/Wilmington
JF Harrison, GEH/Wilmington
eDRF Section 0000-0155-1324 R0

Document Components:

- 001 MFN 13-006 Cover Letter.pdf
- 002 MFN 13-006 Enclosure 1 Proprietary.pdf
- 003 MFN 13-006 Enclosure 2 Non-Proprietary.pdf
- 004 MFN 13-006 Enclosure 3 Affidavit.pdf