

RESOLUTION OF COMMENTS BY THE OFFICE OF NUCLEAR REACTOR REGULATION
ON DRAFT SAFETY EVALUATION FOR TOPICAL REPORT
NEDE-33633P, REVISION 0, "LICENSING TOPICAL REPORT
GE METHODOLOGY FOR IMPLEMENTING TSTF-493 REVISION 4"
(TAC NO. ME5760)

Location	Comment	NRC Disposition
Section 1.0 Introduction	Page 1 (line 15) GEH suggests adding "MFN" just before "11-028" and moving the period to be outside of the parenthesis.	Comment accepted. Change made in final SE.
Section 1.0 Introduction	Page 1 (line 30) GEH suggests adding "P" after "NEDE-33633."	Comment accepted. Change made in final SE.
Section 3.0 Technical Evaluation	Page 4 (line 40) Since the instrument setting (NTSP _F) and AV are determined by the GEH setpoint methodology and not TSTF methodology in NEDE-33633P (as noted on SER page 5 lines 21 and 22) GEH suggests clarifying by rewording lines 39 through 41 as follows: 39 Analytical Limit will not be exceeded if the as-found value of <u>the instrument setting</u> established by 40 the methodology in <u>NEDC-31336P-A</u> NEDE-33633P of the instrument setting were to be at 41 the AV.	Comment accepted. Change made in final SE.
Section 3.0 Technical Evaluation	Page 5 (lines 3-4, 10-11, and 20-21) Because NEDE-33633P is not used to determine the final adjusted NTSP (NTSP _F) (as noted on SER page 5 lines 21 and 22) , GEH suggests deleting portions of the 1 st and 2 nd paragraphs on Page 5 as shown below: 3 TR GEH NEDE-33633P provides a methodology for determining the " Final " 4 NTSP (NTSP_F) and AL T and AFT associated with the criteria established in 5 TSTF-493. The methodology for determining NTSP_F and	Comment accepted. Changes made in final SE.

	<p>ALT/AFTs addresses</p> <p>10 The setpoint calculation methodology in NEDE-33633P {henceforth referred to as</p> <p>11 "GEH TSTF-493 Methodology") is then used to determine the AFT and AL T and</p> <p>12 NTSP based on TSTF-493 guidance for instrument performance monitoring and</p> <p>20 NTSP and the AFT and AL T values for the specific instrument functions</p> <p>21 identified in TSTF-493, and does not affect the setpoints calculated by GEH</p> <p>22 Instrument Setpoint Methodology to (NEDC-31336P-A).</p>	
<p>Entire document</p>	<p>Some of the information provided is considered to be GEH proprietary information. See the attached markup with dotted underline within double square brackets. <u>[[This sentence is an example.⁽³⁾]]</u></p>	<p>The staff agrees with the information identified by GEH as proprietary.</p>
<p>Section 3.0 Technical Evaluation</p> <p>Compatibility with Site Calibration Procedures</p>	<p>Page 8 (lines 38-43)</p> <p>The 2nd paragraph states that:</p> <p>38 "The staff notes that in the event that the AFT cannot be</p> <p>39 accommodated between the existing AV and NTSP, then the NTSP will be</p> <p>40 adjusted more conservative such that the AFT can be accommodated. Similarly,</p> <p>41 in the event that the [</p> <p style="padding-left: 40px;">] cannot be</p> <p>42 accommodated between the existing AV and NTSP, then the NTSP will be</p> <p>43 adjusted more conservative such that the [] can be accommodated."</p> <p>For clarification purposes note that according to GEH TSTF methodology (NEDE-33633P Section 3.3.3 item 2, page 3-9) the AFT is never larger than the AV/NTSP_F margin. This is because AFT is a measure of instrument performance and maintaining a smaller AFT means maintaining a tighter more</p>	<p>Comments accepted. Changes made in final SE.</p>

	<p>conservative margin for monitoring instrument performance. That is why if the AFT calculated by TSTF methodology is larger than the AV/NTSP_F margin, the GEH TSTF methodology conservatively chooses the smaller AV/NTSP_F margin as the AFT. This means that the setpoint can be maintained and no lowering of setpoint is required. If the AFT calculated by TSTF methodology was smaller than the AV/NTSP_F margin then GEH TSTF methodology requires that the AFT be the smaller TSTF AFT, and in this case also no change in setpoint is required.</p> <p>Implementing GEH TSTF methodology does not require any changes to the setpoints determined by setpoint methodology (as noted in SER page 5 Lines 21-22), and is designed to calculate to calculate AFTs and ALTs to be used by the Licensees in the Calibration Procedures (and in the Instrument Performance Monitoring program).</p> <p>GEH suggests re-writing lines 38-43 as follows: The staff notes that in the event that the AFT permitted by TSTF-493 [</p> <p style="text-align: center;">] which also maintains the setpoint (NTSPF) at its current value. The GEH TSTF-493 Methodology applies the same approach to AFTs [</p> <p style="text-align: center;">] This is acceptable because it means GEH TSTF-493 Methodology applies tighter AFT margins than required by TSTF-493 for instrument performance monitoring which is conservative.</p>	
<p>NEDE-33633P Section 3.0 Last Paragraph Page 3-2</p>	<p>Based on a recent Request for Additional Information (RAI) question for the Columbia ARTS-MELLLA / Power Range Neutron Monitor (PRNM) project, GEH proposes the following clarification to the nomenclature in NEDE-33633P-A, as shown below:</p> <p>“In addition to these required margins, the GEH Instrument Setpoint Methodology also provides for margin between the AV and the final nominal trip setpoint (NTSP_F). The AV – NTSP_F margin includes all instrument uncertainties under calibration conditions and is provided to reduce the probability that the AV will be exceeded during calibration conditions, and generally results in an NTSP_F that is more conservative than NTSP₁. This margin is called the Licensee Event Report (LER) Avoidance Margin (hereafter referred to as the LER Margin). The LER Avoidance Margin provides additional assurance that the AV will</p>	<p>Comment accepted. Changes made in final SE.</p>

	<p>not be exceeded during the required surveillance testing and to demonstrate compliance with the Technical Specifications.”</p> <p>Similarly, the use of “LER Margin” will be replaced throughout the document with “LER <u>Avoidance</u> Margin” in the NEDE-33633P-A issue. Relevant sections:</p> <ul style="list-style-type: none">• 3.2.3 on page 3-5 (3 instances)• 3.3.3 on page 3-10 (2 instances)• Figure 3-1 on page 3-14 (1 instance) <p>The affected pages of NEDE-33633P/NEDO-33633 have been included in Enclosure 3 (proprietary) and Enclosure 4 (non-proprietary).</p>	
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