

Enclosure 2

MFN 13-015

GEH Response to RAI 3.9-295

Public Version

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NRC RAI 3.9-295

In Engineering Report NEDE-33313P, "ESBWR Steam Dryer Structural Evaluation," Revision 3, the water within and around the bottom skirt region is currently modeled using [[[REDACTED]]]. However, GEH states that an alternative equivalent approach may be used instead. The NRC staff requests whether GEH will commit to rebenchmarking the end-to-end approach using their GGNS model if they change the water modeling approach.

GEH Response

Responses to each element of the NRC request are provided below.

Engineering Report NEDE-33313P "ESBWR Steam Dryer Structural Evaluation," Revision 3, will be designated Tier 2* material as committed to in GEH response to RAI 3.9-271 S01 and any changes to the modeling methodology now contained in Engineering Report NEDE-33313P will require prior NRC approval. If GEH elects to use an alternative equivalent approach to modeling water within and around the bottom skirt region of the Steam Dryer other than using [[[REDACTED]]] then GEH will follow the appropriate change control process for information supporting the DCD. In addition, GEH will maintain consistent modeling approaches between the ESBWR dryer evaluation and benchmarks that provide the basis for bias and uncertainty.

NEDE-33313P, Section 5.1, is modified to clarify that an alternative method is subject to the appropriate change process. NEDE-33313P, Section 10.1, contains a similar caution regarding an alternate approach and the change process.

ESBWR Licensing Basis Changes

Revised Engineering Report NEDE-33313P reflecting the changes described above is submitted separately.