

Comment Resolution Table for NEDE-33075P, Revision 7, “GE Hitachi Boiling Water Reactor Detect and Suppress Solution- Confirmation Density”

#	Location In Draft SE	GEH Comment	NRC Staff Resolution
1	Section 1.0 Introduction Page 1 (lines 40-41), Page 2 (line 1)	<p>GEH suggests the following changes: A Final Safety Evaluation has been issued for NEDE-33147P, Revision 3 (Reference 6), while NEDE-32465 Supplement 1 (Reference 7). These additional TRs are simultaneously is currently under review by the NRC staff.</p>	<p>Replaced last sentence of paragraph with: “TR NEDO-32465, Supplement 1 is still under NRC staff review.” Revised Reference 6 to reflect that final SE and “-A” version of NEDC-33147P have been issued.</p>
2	Table 2 Page 14 (parameter name GSF & MSF)	Delete first two rows. Move these first two rows from Table 2 to Table 3.	Incorporated.
3	Table 2 Page 14 (parameter name m)	GEH suggests the following change: Slope of the automatic Backup Stability Protection (BSP) APRM flow biased trip and rod block setpoint linear segments. [[]]	Incorporated.
4	Table 2 Page 14 (parameter name P _{BSP-RB} ²)	GEH suggests the following change: Automatic BSP APRM flow biased rod block setpoint power intercept (% Rated power). The STP from the APRM channel is used to provide the power level. [[]]	Incorporated.

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5	Table 2 Page 14 (parameter name W_{BSP-RB^2})	GEH suggests the following change: Automatic BSP APRM flow biased rod block setpoint drive flow intercept (% Rated drive flow). The total recirculation flow (average of both loops) from the APRM channel is used to provide the recirculation drive flow. [[]]	Incorporated.
6	Table 2 Page 14 (lines 3 & 5)	Please change "GE" to "GEH" in two locations.	Incorporated.
7	Table 3 Page 15 (Table 3)	Add first two rows from Table 2 (parameters GSF and MSF).	Incorporated.
8	Table 3 Page 15 (parameter name Manual BSP Region II)	GEH suggests the following change: Inadvertent entry in Region II requires immediate exit. Intentional entry is permitted with stability control measured (See Section 7.2.3.2 of the Approved LTR)	Incorporated.
9	Section 3.6 Revision 7 Updates Page 17 (line 19)	GEH suggests the following changes: "... from decay ratio (DR) ≤ 0.6 to DR ≤ 0.8, and an Operator Awareness Region has been"	Incorporated.
10	Section 3.6 Revision 7 Updates Page 17 (line 25)	GEH suggests the following addition: "... which has been submitted reviewed and approved separately to the ..."	Sentence revised as follows: "The CSAU section has been moved from the DSS-CD TR (Reference 1) to the approved DSS-CD TRACG Application TR (Reference 6) which has been submitted separately to the NRC for review."

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11	Section 3.6 Revision 7 Updates Page 17 (line 33)	GEH suggests the following change: [[]]	Incorporated.
12	Section 3.6 Revision 7 Updates Page 19 (line 8)	GEH suggests the following change: “...flow and power continue to be reduced following the pump trip and this may increases the available...”	Incorporated.
13	Section 6.0 Conclusion Page 24 (line 1)	GEH suggests the following change: “...reduction events; (b) for some plants these instabilities may develop in a time frame of...”	Incorporated.
14	Section 6.0 Conclusion Page 24 (line 8)	GEH suggests the following change: “...(Reference 1), and it provides three different options elements : Manual BSP...”	Incorporated.
15	Section 6.0 Conclusion Page 24 (lines 12-14)	GEH suggests the following clarification to Item 5.a: The ABSP option and the BSP Boundary option are acceptable backup solutions for short periods of time (up to 120 days for BSP Boundary) when the licensed solution (e.g., DSS-CD) is declared inoperable. For the BSP Boundary, this time is limited to 120 days. This time frame is consistent with Action 3.3.1.1-J.3 of the proposed TSs.	Incorporated.

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N/A	Section 6.0 Conclusion Item #7.	Additional change made by NRC staff.	Revised paragraph as follows: For situations where the plant applicability checklist is not satisfied (e.g., introduction of a new fuel type) Tables 6-3 and 6-4 of NEDC-33075P, Revision 7 (Reference 1), describe the approved fuel transition scenarios when plant-specific review is not required describe an acceptable procedure to extend the future applicability of DSS-GD.
16	Section 6.0 Conclusion Page 24 (lines 37-39)	GEH suggests the following change to Item 9: Table 6.5 of NEDC-33075P, Revision 7 (Reference 1), describes the approved fuel transition scenarios, so which are subject to a plant-specific review for each application-submittal is not required.	Incorporated.
17	Section 6.0 Conclusion Page 25 (line 2)	GEH suggests the following change: []	Incorporated.
18	Section 6.0 Conclusion Page 25 (lines 20-21)	GEH suggests the following addition: For any other fuel design, the fuel transition process described in Table 6-5 is approved.	Incorporated.

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19	Section 7.0 References Page 26 (lines 22-23)	GEH suggests the change to Reference 6: TR NEDE-33147P-A, Revision 43 , "DSS-CD TRACG Application," dated <u>August 2013</u> . January 2014 (ADAMS Package Accession No. ML110270074)	Reference 6 was revised as follows: TR NEDE-33147P-A, Revision 4, "DSS-CD TRACG Application," dated August 2013. (ADAMS Package Accession No. ML13224A319)
20	Appendix A Introduction Page A-1 (lines 32-33)	"The NRC staff is currently also reviewing has reviewed and approved the TRACG04 code for DSS-CD application,	Incorporated.
21	Appendix A References Page A-3 (lines 39-40)	GEH suggests the change to Reference 2: TR NEDE-33147P-A, Revision 43 , "DSS-CD TRACG Application," dated <u>August 2013</u> . January 2014 (ADAMS Package Accession No. ML110270074)	Reference 2 was revised as follows: TR NEDE-33147P-A, Revision 4, "DSS-CD TRACG Application," dated August 2013. (ADAMS Package Accession No. ML13224A319)
22	Appendix A	Note, consistent with the Technical Evaluation which was included in the SE for Revision 5 of NEDC-33075P, Appendix A is proprietary in its entirety.	Noted.
23	Entire document	Some of the information provided is considered to be GEH proprietary information. See the attached markup with dotted underline within double square brackets. [[This sentence is an example.]]	Noted. NRC staff marked the proprietary content with bold text within single brackets. [Example.]