



**HITACHI**

**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.

**James F. Harrison**

GE-Hitachi Nuclear Energy Americas LLC  
Vice President, Fuel Licensing, Regulatory Affairs  
P.O. Box 780, M/C A-75  
Wilmington, NC 28401 USA

T 910.620.1826  
james.harrison@ge.com

MFN 14-038  
June 26, 2014

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

**Subject:** Draft Safety Evaluation for GE-Hitachi Nuclear Energy Americas, LLC Licensing Topical Report NEDO-32465, Supplement 1, “Migration to TRACG04/PANAC11 from TRACG02/PANAC10 for Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications” (TAC No. ME7104)

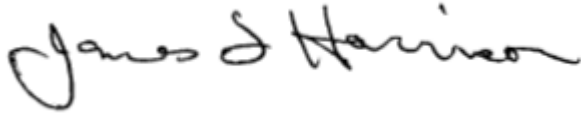
In Reference 1, the NRC provided the draft Safety Evaluation (SE) of the subject topical report and requested that GE Hitachi Nuclear Energy (GEH) identify any information that it considers proprietary and provide comments on factual errors or clarity concerns. The enclosures to this letter provide the GEH response to this request.

Please note that Enclosure 1 contains proprietary information of the type that GEH maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GEH as indicated in its affidavit. The affidavit contained in 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 1 is the proprietary version of the Comment Summary Table and Markup of Draft Safety Evaluation. Enclosure 2 is a non-proprietary version. Enclosure 3 contains the affidavit.

If you have any questions, please contact me at 910-620-1826.

Sincerely,



James F. Harrison  
Vice President, Fuel Licensing  
Regulatory Affairs  
GE Hitachi Nuclear Energy

Project No. 710

**References:**

1. Letter from Anthony J. Mendiola (NRC) to Jerald G. Head (GEH), Subject: Draft Safety Evaluation for GE-Hitachi Nuclear Energy Americas, LLC Licensing Topical Report NEDO-32465, Supplement 1, "Migration to TRACG04/PANAC11 from TRACG02/PANAC10 for Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications" (TAC No. ME7104), June 2, 2014.

**Enclosures:**

1. Comment Summary Table and Draft SE Markup – GEH Proprietary Information – Class II (Internal)
2. Comment Summary Table and Draft SE Markup – Non-Proprietary Information – Class I (Public)
3. Affidavit dated June 24, 2014

cc: J Golla, NRC  
JG Head, GEH Wilmington  
J Vedovi, GEH Wilmington  
PL Campbell, GEH Washington  
PT Tran, GEH Vallecitos  
PLM Specification 001N3103 R0

**Document Components:**

- 001 MFN 14-038 Cover Letter.pdf
- 002 MFN 14-038 Enclosure 1 Proprietary.pdf
- 003 MFN 14-038 Enclosure 2 Non-Proprietary.pdf
- 004 MFN 14-038 Enclosure 3 Affidavit