



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

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**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.

M170112  
May 19, 2017

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

**Subject: Draft Safety Evaluation for Global Nuclear Fuel – Americas LLC, NEDC-33840P, The PRIME Model for Transient Analysis of Fuel Rod Thermal Mechanical Performance (CAC No. MF7687)**

In Reference 1, the NRC provided a draft Safety Evaluation (SE) of the subject topical report and requested that Global Nuclear Fuel - Americas LLC (GNF) identify any information that it considers proprietary and provide comments on factual errors or clarity concerns. The enclosures to this letter provide the GNF response to this request.

Please note that Enclosure 1 contains proprietary information of the type that GNF maintains in confidence and withholds from public disclosure. The affidavit contained within Enclosure 3 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GNF. GNF 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 or Jim Harrison at 910-620-1826.

Sincerely,

Brian R. Moore  
General Manager, Core & Fuel Engineering  
Global Nuclear Fuel – Americas, LLC

Project No. 712

**References:**

1. Letter from Kevin Hsueh (NRC) to Jerald Head (GEH), Subject: Draft Safety Evaluation for Global Nuclear Fuel – Americas LLC, NEDC-33840P, The PRIME Model for Transient Analysis of Fuel Rod Thermal Mechanical Performance (CAC No. MF7687), M170111, April 20, 2017.

**Enclosures:**

1. Comment Summary Table and Draft SE Markup – GNF Proprietary Information – Class II (Internal)
2. Comment Summary Table and Draft SE Markup – Non-Proprietary Information – Class I (Public)
3. Affidavit dated May 2017

cc: J Golla, US NRC  
JG Head, GEH/Wilmington  
PL Campbell, GEH/Washington  
JF Harrison, GEH/Wilmington  
PLM Specification 001N7862 R2

001 M170112 Cover Letter.pdf  
002 M170112 Enclosure 1 Proprietary.pdf  
003 M170112 Enclosure 2 Non-Proprietary.pdf  
004 M170112 Enclosure 3 Affidavit.pdf