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NRC:17:027

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Response to Request for Comment on Draft SER for ANP-10336P, Revision 0, "Z4B Fuel Channel Irradiation Program"

Ref. 1: Letter Kevin Hsueh (NRC) to Gary Peters (AREVA Inc.) "Draft Safety Evaluation for AREVA Inc. Topical Report ANP-10336P, Revision 0, "Z4B Fuel Channel Irradiation Program (CAC NO. MF6468)," May 17, 2017.

In Reference 1, the NRC issued a draft safety evaluation (SE) for ANP-10336P, Revision 0, requesting AREVA Inc. (AREVA) review the document for proprietary material and for factual errors.

AREVA reviewed the draft SE and determined that it does not contain information that was identified in the topical report as being proprietary information. Attachment A to this letter provides a marked-up copy of the draft SE, showing a few minor clarifications. Attachment B provides a summary table of the minor clarifications.

There are no new commitments within this letter or its enclosures.

AREVA appreciates this opportunity to offer clarifying comments. If you have any questions related to this information, please contact Mr. Alan Meginnis by telephone at (509) 375-8266, or by e-mail at Alan.Meginnis@areva.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

Attachments:
Attachment A- Mark-up of draft Safety Evaluation
Attachment B- Summary Table of minor clarifications

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ATTACHMENT B

Summary Table of Proposed Changes for SER
of Topical Report ANP-10336P, Revision 0
"Z4B Fuel Channel Irradiation Program"

<u>Page No.</u>	<u>Line(s) No.</u>	<u>Proposed Change and Reason</u>
1	32	Changed "schedule" to "limit" and changed "per reload" to "in the core" – Suggestion for clarity
2	26	Changed "per reload batch" to "in the core" – Suggestion for clarity
2	46	Deleted "(integral part)" – Suggestion for clarity
2	46 – 49	Deleted ", until PIE analysis shows that increasing the number of LUCs in the core beyond 8 percent does not exceed the accepted probability estimate of k LUCs exceeding the limit at greater than 8 percent LUCs in the core" – Suggestion for clarity
3	6	Changed "Z4B-RXB" to "Z4B-RXA" – Typographical error
3	10	Changed "no" to "limited" – Suggestion for clarity
3	34 – 40	Deleted "Two things should be kept in mind with regard to these comparisons. The first is that the database for acceptance of Zry-4 and Zry-2 for full core use was by far much larger than that presented in Reference 4 for Z4B, yet the channel distortion was under predicted with a computed level of confidence. This was due to the shortcoming in the analysis of the estimated confidence interval. Secondly, given that the current database for Z4B is by far much smaller, yet the analysis remains the same, arguments in favor of Z4B are not meaningful." Subsequent lines renumbered accordingly. – Suggestion for clarity
4	2 – 3	Changed "and in no way implies superior resistance to channel distortion by the NRC staff" to "The NRC has approved this expanded LUC program in order to acquire data which may demonstrate Z4B fuel channels have improved resistance to fuel channel distortion" – Suggestion for clarity
4	35	Changed "Z4B RXR" to "Z4B RXA" – Typographical error
4	41	Deleted "(integral part)" – Suggestion for clarity