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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.

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

Subject: Satisfaction of Limitation 10.7 for NEDE-33005P, Revision 0, "Licensing Topical Report TRACG Application for Emergency Core Cooling Systems / Loss-of-Coolant-Accident Analyses for BWR/2-6"

By Reference 1, the NRC issued the final Safety Evaluation (SE) for GE Hitachi Nuclear Energy (GEH) Licensing Topical Report (LTR) NEDE-33005P, Revision 0, "Licensing Topical Report TRACG Application for Emergency Core Cooling Systems / Loss-of-Coolant-Accident Analyses for BWR/2-6." Limitation 10.7 in the SE indicated that the jet pump plant nodalization studies should be updated/reviewed/accepted prior to application to a jet pump plant. This letter is being submitted to satisfy Limitation 10.7.

Limitation 10.7 is reproduced below:

10.7 BWR/3-6 FIRST-OF-A-KIND APPLICATION

> The NRC staff review effort included a detailed review of TRACG-LOCA as applied to a BWR/2, and as such, the application of TRACG-LOCA to Nine Mile Point Nuclear Station, Unit 1, is acceptable without further limitation. However, the NRC staff notes that the demonstration analyses and nodalization sensitivity studies supporting application of TRACG-LOCA to BWR/3-6 plants, were not updated to reflect the increased core detail and revised statistical approach that were revised as a result of the NRC staff review. As such, the NRC staff requires that GEH perform updated demonstration analyses for each of a BWR/4 and BWR/6, and an update to the BWR/4 nodalization sensitivity studies, and provide them for NRC staff review and acceptance, prior to first-of-a-kind application of TRACG-LOCA to a BWR/3-6. Specifically, the jet pump plant nodalization studies should be updated/reviewed/accepted prior to application to a jet pump plant. The BWR/4 demonstration studies should be updated/reviewed/accepted prior to application to a BWR/3-4, and similarly, the BWR/6 demonstration studies should be updated/reviewed/accepted prior to application to a BWR/5-6.

> This limitation can be satisfied by revising the jet pump plant nodalization studies documented in LTR Section 5.2, Table 5.2-1 and Figures 5.2-1 through 5.3-9 and the key summary demonstration analyses documented in LTR Chapter 8, Figure 8.1-29 for the BWR/4 and Figure 8.2-18 for the BWR/6.
> [Note: Figure 5.3-9 above is a typo. This figure number should be 5.2-9.]

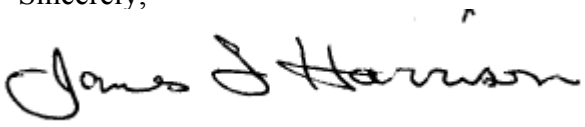
GEH has completed the jet pump plant nodalization studies in satisfaction of Limitation 10.7 and updated the figures and tables defined in Limitation 10.7. LTR Section 5.2, Table 5.2-1 and Figures 5.2-1 through 5.2-9 and the key summary demonstration analyses documented in LTR Chapter 8, Figure 8.1-29 for the BWR/4 and Figure 8.2-18 for the BWR/6 are included in Enclosure 1. GEH requests that the NRC review the information provided and remove Limitation 10.7.

Upon NRC approval of the enclosed information, GEH will update NEDE-33005P-A Revision 1 to incorporate Enclosure 1 into a new appendix in the LTR.

Enclosure 1 contains proprietary information of the type that GEH 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 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 2 is a non-proprietary version of Enclosure 1.

If you have any questions, please contact me.

Sincerely,



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Project No. 710

References:

1. Letter from Kevin Hsueh (NRC) to Jerald G. Head (GEH), "Final Safety Evaluation for GE Hitachi Nuclear Energy – Americas, LLC Topical Report NEDE-33005P and NEDO-33005, Revision 0, "Licensing Topical Report TRACG Application for Emergency Core Cooling Systems / Loss-of-Coolant-Accident Analyses for BWR/2-6" (CAC No. ME5405)," February 14, 2017.

Enclosures:

1. Additional TRACG LOCA LTR Analyses to Satisfy NRC Final Safety Evaluation Limitation 10.7 – GEH Proprietary Information – Class II (Internal)

2. Additional TRACG LOCA LTR Analyses to Satisfy NRC Final Safety Evaluation Limitation 10.7 – Class I (Public)

3. Affidavit for Enclosure 1

cc: J Golla, US NRC
JG Head, GEH/Wilmington
PL Campbell, GEH/ Washington
BR Moore, GEH/Wilmington
PT Tran, GEH/Vallecitos
PLM Specification NEDE-33005 R1.1

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