

RESOLUTION OF COMMENTS BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
ON DRAFT SAFETY EVALUATION FOR TOPICAL REPORT ANP-10336P, REVISION 0,  
“Z4B FUEL CHANNEL IRRADIATION PROGRAM”

AREVA INC.

Project No. 728

This attachment provides the U.S. Nuclear Regulatory Commission (NRC) staff’s review and disposition of the comments made by AREVA Inc. (AREVA) on the draft safety evaluation (SE) for Topical Report ANP-10336P, Revision 0, “Z4B Fuel Channel Irradiation Program.” AREVA provided a marked up version of the draft SE along with the comments (ADAMS Accession No. ML17170A113) to facilitate the NRC staff understanding of the comments.

<u>Page No.</u>	<u>Line(s) No.</u>	<u>Proposed Change and Reason</u>	<u>NRC Resolution of Comments</u>
1	32	Changed “schedule” to “limit” and changed “per reload” to “in the core” – Suggestion for clarity	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
2	26	Changed “per reload batch” to “in the core” – Suggestion for clarity	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
2	45	Deleted “(integral part)” – Suggestion for clarity	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
2	45 – 48	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	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.

Enclosure

<b><u>Page No.</u></b>	<b><u>Line(s) No.</u></b>	<b><u>Proposed Change and Reason</u></b>	<b><u>NRC Resolution of Comments</u></b>
3	10	Changed “no” to “limited” – Suggestion for clarity	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
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	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
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	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
4	33	Changed “Z4B RXR” to “Z4B RXA” – Typographical error	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.
4	39	Deleted “(integral part)” – Suggestion for clarity	The NRC staff agrees with the editorial suggestion. Change implemented in final SE.