



**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.

M190069  
April 18, 2019

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

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**Subject: Draft Safety Evaluation for NEDC-33173P Supplement 6 – Applicability of GE Methods to Expanded Operating Domains – Removal of the Safety Limit Minimum Critical Power Ratio (SLMCPR) Penalty**

In Reference 1, the NRC provided a draft Safety Evaluation (SE) of the subject topical report and requested that GE-Hitachi Nuclear Energy Americas LLC (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 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 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 questions regarding the enclosed references, please contact me or Joshua Finch at 910.819.6115.

Sincerely,

Lisa K. Schichlein  
Senior Project Manager, NPP/Services Licensing  
Regulatory Affairs  
GE-Hitachi Nuclear Energy Americas LLC

Project No. 710  
Docket No. 99902024

**Reference:**

1. Letter from Dennis C. Morey (NRC) to Michelle P. Catts (GEH), Subject: Draft Safety Evaluation for NEDC-33173P Supplement 6 – Applicability of General Electric Methods to Expanded Operating Domains – Removal of the Safety Limit Minimum Critical Power Ratio Penalty (EPID L-2017-TOP-0040), March 26, 2019.

**Enclosures:**

1. Comment Summary Table and Draft SE Markup – GEH Proprietary Information – Non-Public
2. Comment Summary Table and Draft SE Markup – Non-Proprietary Information
3. Affidavit dated April 2019

cc: J Golla, US NRC  
K Heller, US NRC  
MP Catts, GEH/Wilmington  
D Rock, GEH/Wilmington  
J Hannah, GEH/Wilmington  
J Finch, GEH/Wilmington  
PLM Specification 004N4568 Revision 2

**Document Components:**

001 M190069 Cover Letter.pdf  
002 M190069 Enclosure 1 Proprietary.pdf  
003 M190069 Enclosure 2 Non-Proprietary.pdf  
004 M190069 Enclosure 3 Affidavit.pdf