



**Brian R. Moore, Ph.D.**  
Global Nuclear Fuel – Americas, LLC  
General Manager, Core & Fuel Engineering  
P.O. Box 780, M/C A55  
Wilmington, NC 28401 USA

T 910-232-2115  
Brian.Moore@ge.com

M190143

August 15, 2019

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

**Subject: Draft Safety Evaluation for Proposed Amendment 47 to NEDE-24011-P-A-27,  
“General Electric Standard Application for Reactor Fuel (GESTAR II)  
Supporting Implementation of TSTF-564” (EPID L-2018-TOP-0038)**

In Reference 1, the NRC provided a draft Safety Evaluation (SE) for the proposed GESTAR II Amendment 47 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. GNF did not identify any proprietary information in the draft SE. 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 Kent Halac at 910-819-5307.

Sincerely,

A handwritten signature in black ink that reads 'B R Moore'.

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

Docket No. 99901376  
Project No. 712

**Reference:**

1. Letter from Dennis C. Morey (NRC) to Michelle P. Catts (GEH), Subject: Draft Safety Evaluation for Proposed Amendment 47 to NEDE-24011-P-A-27, “General Electric Standard Application for Reactor Fuel (GESTAR II) Supporting Implementation of TSTF-564” (EPID L-2018-TOP-0038), July 25, 2019.

**Enclosure:**

1. Comment Summary Table and Draft SE Markup – GNF Proprietary Information – Non-Public
2. Comment Summary Table and Draft SE Markup – Non-Proprietary Information
3. Affidavit

cc: J Golla, US NRC  
MP Catts, GEH/Wilmington  
KE Halac, GNF/Wilmington  
PLM Specification 005N4139 Revision 0

**Document Components:**

001 M190143 Cover Letter.pdf  
002 M190143 Enclosure 1 Proprietary.pdf  
003 M190143 Enclosure 2 Non-Proprietary.pdf  
004 M190143 Enclosure 3 Affidavit.pdf