



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

M190192

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

**Subject: Draft Safety Evaluation for Licensing Topical Report NEDE-33885P, Revision 0,
“GNF CRDA Application Methodology” (EPID L-2018-TOP-0006)**

In Reference 1, the NRC provided a draft Safety Evaluation (SE) for the GNF CRDA Application Methodology 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. 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 "Brian R. Moore". The signature is written in a cursive, flowing style.

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 Licensing Topical Report NEDE-33885P, Revision 0, “GNF CRDA Application Methodology” (EPID L-2018-TOP-0006), October 16, 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: N Otto, US NRC
MP Catts, GEH/Wilmington
KE Halac, GNF/Wilmington
PLM Specification 005N5144 Revision 0

Document Components:

001 M190192 Cover Letter.pdf
002 M190192 Enclosure 1 Proprietary.pdf
003 M190192 Enclosure 2 Non-Proprietary.pdf
004 M190192 Enclosure 3 Affidavit.pdf