GENERAL ELECTRIC

NUCLEAR POWER

SYSTEMS DIVISION

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MFN-071-81
REE-036-81

April 17, 1981

U.S. Nuclear Regulatory Commission
Division of Project Management
Washington, DC 20555

Attention: J. S. Berggren
Standardization and Special Projects Branch

Gentlemen:

SUBJECT: GENERAL ELECTRIC COMPANY LICENSING TOPICAL REPORT NEDE-24011-P-A-1, "GENERIC RELOAD FUEL APPLICATION," AMENDMENT 10

References:
1) Letter, R. L. Tedesco (NRC) to G. G. Sherwood (GE), "Acceptance for Referencing General Electric Licensing Topical Report NEDO-24154/NEDE-24154P," February 4, 1981
2) Letter, R. E. Engel (GE) to T. A. Ippolito (NRC), "Change in GE Methods for Analysis of Cold Water Injection Transients," September 30, 1980
3) Letter, R. E. Engel (GE) to T. A. Ippolito (NRC), "Change in GE Methods for Analysis of Mislocated Bundle Accident," November 14, 1980
4) Letter, R. E. Engel (GE) to Robert L. Tedesco (NRC), "GE/NRC Meeting on Licensing Topical Report Update Input," April 9, 1981

Enclosed are twenty-five copies of the subject Amendment 10 to the Generic Reload Licensing Topical Report for your review and approval. This amendment incorporates the ODYN computer code approved in the Safety Evaluation Report attached to the Reference 1 letter. This computer code is used to analyze the rapid core-wide pressurization events documented in Section 5.2 of the Licensing Topical Report and the overpressure protection event given in Section 5.3. Also included in this amendment is use of the 3-D Simulator Model previously approved by the NRC for the Loss of Feedwater Heating event (as described in Reference 2) and deletion of the mislocated bundle event (Reference 3).

Incorporation of the results of the generic NRC ODYN review does not represent an unreviewed safety question. The previously approved 3-D simulator model calculates the Loss of Feedwater Heating event with greater accuracy. Use of this model will not result in a change to

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plant technical specifications nor does it result in an unreviewed safety question as defined in 10CFR50.59. The mislocated bundle analysis was eliminated by statistically showing a 95% probability with 95% confidence that the MCPR fuel cladding integrity safety limit for this event will not be exceeded. Methods used to analyze the events used in the statistical analysis were approved by the NRC and the statistical basis has been accepted on many other applications. Therefore, it has been determined that the elimination of this mislocated fuel loading error analysis for reloads does not constitute an unreviewed safety question. The changes indicated in this revision will be included with the non-safety related changes to be submitted to the NRC as noted in the Reference 4 letter.

Please notify J. S. Charnley ((408) 925-3597) or R. R. Galer ((408) 925-3747) of my staff if you have any questions relative to this amendment.

Very truly yours,

R E Engel

R. E. Engel, Manager
Reload Fuel Licensing
Nuclear Safety and Licensing Operation

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cc: L. S. Gifford