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June 2, 1994
JHT/94-084

U. S. Nuclear Regulatory Commission
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- References:
1. A. C. Thadani to J. H. Taylor, Acceptance for Referencing of Topical Report BAW-10183-P, "Fuel Rod Gas Pressure Criterion," February 22, 1994.
 2. M. J. Virgilio to J. H. Taylor, Clarification to NRC SER Conclusions Regarding Topical Report BAW-10184P, "GDTACO - Urania Gadolinia Fuel Pin Thermal Analysis Code," April 12, 1994.

Subject: Fuel Rod Gas Pressure Criterion Topical Report, BAW-10183P.

Gentlemen:

The purpose of this letter is to request clarification and modification of certain sections of the safety evaluation report (SER) and accompanying technical evaluation report (TER) for BWFC topical report BAW-10183P. These changes were discussed in a telephone call between the NRC, their contractor reviewer (PNL), and BWFC personnel on May 26, 1994. The NRC and PNL agreed with the suggestions that were proposed by BWFC.

The proposed changes to the TER are as follows:

Page 1.2: in the first sentence change "...loss of coolant accidents (LOCAs)" to..."normal operation and anticipated operational occurrences,"

page 2.3, second paragraph, last sentence - satisfactory is spelled incorrectly,

page 3.1, third paragraph - change "5-cycle" to '4-cycle,"

page 6.1, section 6.2, change the first paragraph as follows:

BWFC states that it will re-perform its core protection evaluation (via the response surface method) against the proposed core protection criterion (99.99%) if the critical input parameters, as defined in Tables 4.11 and 4.12 of

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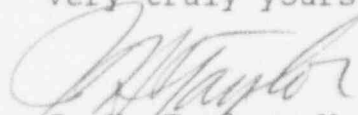
reference 1, change. PNL concurs, and adds that, if any of the other crucial assumptions or statistical distributions that form the input for the response surface application change, then the core protection evaluation should be re-performed using the methods defined in reference 1.

In consideration of these changes to the TER, page 2 of the SER should be revised as follows:

... and (2) if there are changes involving the critical input parameters for the response surface applications, the core protection analysis shall be revised according to the method described in BAW-10183-P.

By copy of this letter, BWFC requests that NRC provide concurrence with these proposed revisions in a letter such as reference 2. This concurrence is needed by June 30, 1994 so that we may submit the accepted (-A) version of the topical report by July 15, 1994.

Very truly yours,



J. H. Taylor, Manager
BWNT Licensing Services

cc: R. C. Jones, NRC
S. L. Wu, NRC
Carl Beyer, PNL
Don Lanning, PNL
R. B. Borsum