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files

NOV 29 1982

General Electric Company
ATTN: Dr. G. G. Sherwood, Manager
Safety and Licensing
175 Curtner Avenue
San Jose, California 95114

Dear Dr. Sherwood:

Subject: Administrative Amendments to GE Licensing Topical Reports
NEDE-24011-P-A-4 and NEDE-24011-A-4-US-Partial Rejection

- References:
1. Letter, J. S. Charnley (GE) to R. L. Tedesco (NRC),
Administrative Amendments to "GE Licensing Topical
Reports NEDE-24011-P-A-4 and NEDE-24011-P-A-4-US
dated August 31, 1982".
 2. NUREG-0390 "Topical Report Review Status".

General Electric Company submitted by Reference 1 their proposal of Administrative Amendments to their licensing topical reports NEDE-24011-P-A-4 and NEDE-24011-P-A-4-US. The staff has examined the changes made within the 8 categories of amendments submitted. We agree that, in general, the changes are administrative. An important exception, however, is the category called Fuel Design Options, which for the most part concerns barrier fuel. We consider barrier fuel to be a design change of the kind normally reviewed by the staff. We have discussed this matter with General Electric by telephone and have described the scope of information that should be submitted for review. That information should then be submitted in accordance with NUREG-0390, reference 3.

With regard to the eighth category of administrative changes, viz., "Typos/Clarification/ Editorial Changes," we note that GE has included some information deletions in this category. For instance, in Tables 2.7a, and 2.7b, the minimum cold plenum length, maximum end plug angularity, and an item called "displacement of hardware inside rod" have been deleted. We will accept these three deletions because they involve design features that either are relatively unimportant or are compensated for elsewhere. However, we do not believe that deletions of technical information, whether in figures, tables or text, should, as a general rule, be defined as editorial or as clarification. Likewise, changes in existing figures or insertions of new design curves that are based on new data should not be treated as administrative.

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We understand that the fatigue curve (Fig. 2-11b) was part of the original fatigue analysis that was reviewed by the former Division of Operating Reactors, and that the curve is being added for completeness of the documentation. This, we agree, is administrative. We want to emphasize, however, that any change to that curve (perhaps involving new data) should be reviewed and not treated as administrative.

The category of changes labeled Typos/Clarification/Editorial Changes constitutes the second largest of the eight categories of changes (about 90 pages of altered text, tables, and figures). Yet there seem to be several typographical and editorial errors in these revisions. Presumably, these errors will require further administrative amendments to correct the documentation. We believe that unless GE can do a better job in quality assuring these proposed amendments, a major benefit of the administrative amendment process, viz., a reduction in staff review, will, in fact, not be achieved.

On page D-US, 2-31a Section S.2.2.3.1 the "16 hours" should be "12 hours".

General Electric is free to issue the proposed Revision 5 to the licensing topical with the exception of the Fuel Design Options change.

Sincerely,

Cecil O. Thomas, Acting Chief
Standardization & Special
Projects Branch
Division of Licensing

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On page D-US, 2-31a Section S.2.2.3.1 the "16 hours" should be "12 hours".

In accordance with Reference 2, General Electric is free to issue the proposed Revision 5 to the licensing topical with the exception of the Fuel Design Options change.

Sincerely,

Cecil O. Thomas, Acting Chief
Standardization & Special
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Division of Licensing

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