

M200016 March 17, 2020 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

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

## Subject: Proposed Amendment 51 to NEDE-24011-P-A-29, General Electric Standard Application for Reactor Fuel (GESTAR II)

The United States Nuclear Regulatory Commission (NRC) performed an audit of the "GNF3 Generic Compliance with NEDE-24011-P-A (GESTAR II)," NEDC-33879P, June 28-30, 2017. (Reference 1). A subsequent follow-up meeting was conducted in September 2017 (Reference 2). There were two actions from the audits and continuing discussions that involved commitments to modify the new fuel criteria of GESTAR II.

The major action of the two involves updating the lead fuel assembly provisions of GESTAR II. The existing lead fuel assembly requirements in GESTAR II are a composite of old letters which have been a source of confusion and questions over the years. The proposed new content improves the definitions for lead fuel assemblies and clarifies the differences in test requirements and numbers for the different types of lead assemblies. The process is encapsulated in a new appendix to GESTAR II. The second update involves the addition of a new subsection containing a commitment to confirm the applicability of the GESTAR II design criteria for a new fuel assembly.

Sections 1.1.1, 1.2.1, 1.5, 2.3.3, and 2.4 are affected. A new subsection 2.3.4 and a new Appendix B are included. Only those pages that have changes are included in the enclosures. All changes are shown in revision mode to ease the review.

GNF has customers that are interested in using the High Burnup Lead Use Assembly (HBLUA) provisions included in the new Appendix B to GESTAR II in upcoming reload core designs. In order to support the use of HBLUAs, GNF requests an accelerated review of six months for this amendment. GNF is prepared to support the NRC in any way to assist in meeting this schedule.

Please note that Enclosure 1 contains proprietary information of the type that Global Nuclear Fuel – Americas (GNF-A) maintains in confidence and withholds from public disclosure. The affidavit contained in Enclosure 3 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GNF-A. GNF-A 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.

Enclosures 2 includes non-proprietary information and a non-proprietary version of Enclosure 1.

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If you have any questions about the information provided here, please contact me at (910) 819-6684 or Kent Halac at (910) 819-5307.

Sincerely,

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

Project No. 712 Docket No. 99901376

## References

- 1. United States Nuclear Regulatory Commission (NRC) Audit of GNF3 Generic Compliance with NEDE-24011-P-A (GESTAR II), NEDC-33879P, Revision 0, Wilmington, NC, June 28-30, 2017.
- United States Nuclear Regulatory Commission (NRC) Follow-Up Audit of GNF3 Generic Compliance with NEDE-24011-P-A (GESTAR II), NEDC-33879P, Revision 0, Wilmington, NC, September 19-20, 2017.

## Enclosures

- 1. Proposed Amendment 51 to GESTAR II US GNF Proprietary Information Non-Public
- 2. Proposed Amendment 51 to GESTAR II US Non-Proprietary Information
- 3. Affidavit for Enclosure 1
- cc: N Otto, USNRC MP Catts, GEH/Wilmington KE Halac, GEH/Wilmington PLM Specification 005N9722 R0

## **Document Components:**

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