



**HITACHI**

**GE Hitachi Nuclear Energy**

~~Proprietary Notice~~

~~This letter transmits proprietary information in accordance with 10 CFR 2.390. Upon removal of Enclosure 3, the balance of the letter may be considered non-proprietary.~~

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M200033  
April 2, 2020

Chris Allen, Project Manager  
Storage and Transportation Licensing Branch  
Division of Fuel Management  
U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555-0001

Attention: Document Control Desk

Subject: **M200033: GEH Revision of the GE Model No. 2000 (Docket No. 71-9228) to Clarify Irradiated Hardware Content and Update the Quality Assurance Program References**

Mr. Allen,

This letter transmits the GE-Hitachi Nuclear Energy Americas, LLC (GEH) amendments to Revision 5 of the GE Model No. 2000 (GE2000) Safety Analysis Report (SAR) [Reference 1]; herein referred to as Revision 6. This letter also transmits supplemental information for the MCNP6 area of applicability and qualification from the NRC and GEH meeting on Friday, March 13, 2020 (Enclosure 6).

The purpose of this amendment is to include additional clarification for the approved irradiated hardware content and update the references to the NRC approved Quality Assurance Program NEDO-11209-A [Reference 2]. These updates to Revision 5 of the GE2000 SAR are incorporated into Revision 6 of the SAR. However, only those amended pages are provided with this letter. For simplicity, this update will be called Revision 6 [Reference 3] throughout the rest of this letter and in the provided enclosures.

Enclosure 1 contains the proprietary affidavit for Enclosure 3 as described below. Enclosure 2 is a detailed list of the changes made to Revision 5 of the SAR [Reference 1], which are now included in Revision 6. It should be noted that Enclosure 2 is also included in Revision 6 of the SAR.

Enclosure 3 is the proprietary version of the updated pages incorporated within Revision 6 of the SAR. Enclosure 4 is a non-proprietary version of Enclosure 3.

Enclosure 5 is a proposed mark-up of the requested changes to Revision 27 of the GE2000 Certificate of Compliance (CoC) [Reference 4] to be included in CoC Revision 28. Enclosure 5 also serves as a summary guide for the requested GE 10x10 BWR irradiated fuel content.

Enclosure 6 is the MCNP6 supplemental information discussed during the GEH and NRC meeting on Friday, March 13, 2020, and is not included as part of the GE2000 SAR.

Please note that Enclosure 3 contains proprietary information of the type that GEH maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GEH as indicated in its affidavit. The affidavit contained in Enclosure 1 identifies that the information contained in Enclosure 3 has been handled and classified as proprietary to GEH. GEH hereby requests that the information in Enclosure 3 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

If you have any questions about the information provided, please contact either Christopher Kmiec (christopher.kmiec@ge.com) or Erik Kirstein (erik.kirstein@ge.com).

Sincerely,



Shawn Lamb  
Engineering Manager, Radiological and Stability Analysis  
GE-Hitachi Nuclear Energy Americas, LLC

Docket No. 71-9228

#### References

1. GE Hitachi Nuclear Energy, NEDO-33866, "Model 2000 Radioactive Material Transport Package Safety Analysis Report," Revision 5, January 31, 2020. United States Nuclear Regulatory Commission ADAMS Accession Number ML20031C710.
2. GE Hitachi Nuclear Energy, NEDO-11209-A, "GE Hitachi Nuclear Energy Quality Assurance Program Description," Revision 14, January 19, 2018. United States Nuclear Regulatory Commission ADAMS Accession Number ML18023A139.
3. GE Hitachi Nuclear Energy, NEDO-33866, "Model 2000 Radioactive Material Transport Package Safety Analysis Report," Revision 6, April 2, 2020.
4. "GE Model No. 2000 Certificate of Compliance No. 9228," Docket Number 71-9228, Revision 27, Package Identification Number USA/9228/B(U)F-96, United States Nuclear Regulatory Commission ADAMS Accession Number ML18102B446.

**Enclosures**

1. Affidavit for Enclosure 3
2. GE2000 SAR Change Summary Table for Enclosures 3 and 4
3. Amended Pages for NEDE-33866P GE2000 SAR Revision 6 – GEH Proprietary Information – Non-Public
4. Amended Pages for NEDO-33866 GE2000 SAR Revision 6 – Non-Proprietary Information
5. Proposed GE2000 CoC Revision Mark-ups to be Included in Revision 28 of the CoC
6. Supplemental Information for MCNP6 Area of Applicability and Qualification for NEDO-33866 Revision 6

cc: N Otto, NRC  
W Allen, NRC  
M Catts, GEH Wilmington, NC  
S Murray, GEH Wilmington, NC  
P McCumbee, GNF Wilmington, NC  
C Kmiec, GEH Wilmington, NC  
E Kirstein, GNF Wilmington, NC  
PLM Specification 005N0663 Revision 1

**Document Components:**

001-M200033-Cover-Letter.pdf  
002-M200033-Enclosure-1-Affidavit.pdf  
003-M200033-Enclosure-2-Change-Table-Non-Proprietary.pdf  
004-M200033-Enclosure-3-GE2000-SAR-Amendment-Proprietary.pdf  
005-M200033-Enclosure-4-GE2000-SAR-Amendment-Non-Proprietary.pdf  
006-M200033-Enclosure-5-Rev-27-CoC-Mark-ups.pdf  
007-M200033-Enclosure-6-MCNP6-Supplemental-Information.pdf