



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

T 910-232-2115
Brian.Moore@ge.com

M200058

July 28, 2020

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

Subject: Draft Safety Evaluation for Revised Proposed Amendment 50 to Topical Report, NEDE-24011-P-A-29, “General Electric Standard Application for Reactor Fuel (GESTAR II)” (EPID L-2019-TOP-0006)

In Reference 1, the NRC provided a draft Safety Evaluation (SE) for the proposed GESTAR II Amendment 50 and requested that Global Nuclear Fuel - Americas LLC (GNF) identify any information that it considers proprietary and provide comments on factual errors or clarity concerns. GNF did not identify any proprietary information in the draft SE and did not identify any factual errors or clarity concerns.

GNF has identified one portion of Section 4.0 of the SE that seems out of place. Enclosure 1 contains the full discussion of the comment.

If you have any questions, please contact me or Kent Halac at 910-819-5307.

Sincerely,

A handwritten signature in black ink that reads "Brian R. Moore". The signature is written in a cursive, flowing style.

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

Docket No. 99901376
Project No. 712

Reference:

1. Letter from Dennis C. Morey (NRC) to Michelle P. Catts (GEH), Subject: Draft Safety Evaluation for Revised Proposed Amendment 50 to Topical Report, NEDE-24011-P-A-29, “General Electric Standard Application for Reactor Fuel (GESTAR II)” (EPID L-2019-TOP-0006), June 30, 2020.

Enclosure:

1. Safety Evaluation Comment – Non-Proprietary Information

cc: N Otto, US NRC
MP Catts, GEH/Wilmington
KE Halac, GNF/Wilmington
PLM Specification 005N2310 R2

ENCLOSURE 1

M200058

Safety Evaluation Comment

Non-Proprietary Information

Safety Evaluation Section 4.0 LIMITATIONS AND CONDITIONS

There are no new limitations and conditions for Amendment 50 to GESTAR II.

It should be noted that when a fuel vendor makes a new, more accurate, and updated methodology the licensee is not required to adopt that new method unless forced to do so by an NRC backfit. If the licensee makes plant modifications that substantially change the systems and components being analyzed, then the NRC staff may require transition to new methodology unless justification can be provided that the older method is still acceptable. This determination by the NRC staff would be done at the time of the License Amendment Request (LAR) for the plant modification or the analysis submittal. The licensee should be prepared to provide such justification if it is going to maintain the older methodology. If that justification, when needed, is not provided at the time of the submittal it could delay the staff review.

Comment

The second paragraph in Section 4.0 seems out of place as it doesn't have anything to do with the Amendment 50 changes to GESTAR II. It is a general statement of NRC policy and position regarding License Amendment Requests (LARs). LARs are seldom required for reloads where the Licensee is applying approved methods contained in GESTAR II including any required Limitations and Conditions specified in the topical Safety Evaluations (SE) approving each method.

The inclusion of the second paragraph in Section 4.0 in the Amendment 50 SE implies that GNF has some responsibility to inform the Licensee of the NRC position. The statements are information directed to the Licensee and are not actionable via the application of GESTAR II to reloads. The NRC should directly inform the Licensees of the position.