



Global Nuclear Fuel

Proprietary Notice

This letter transmits proprietary information in accordance with 10 CFR 2.390. Upon removal of Enclosure 1, the balance of the letter may be considered non-proprietary.

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M210112

October 6, 2021

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

Subject: Accepted Versions of Global Nuclear Fuel – Americas Topical Reports NEDC-33256P, “The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance Part 1 – Technical Bases,” NEDC-33257P, “The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance Part 2 – Qualification,” and NEDC -33528P, “The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance Part 3 – Application Methodology,” Revision 2, October 2021

In September 2010 by Reference 1, GNF submitted the accepted (-A) proprietary and non-proprietary versions of the subject Licensing Topical Reports (LTR) as Revision 1. Subsequently, in 2021 GNF noted that some of the equations in the Reference 1 submittal were missing decimal points. This condition did not affect all equations and the condition was not present in the Revision 0 documents submitted for review and approval. The anomalous condition did not have any effect on the application of the methodology.

GNF has communicated this situation to the NRC Staff, and it was agreed that a revision to the submitted Revision 1 files was the most appropriate solution. Accordingly, Revision 2 has been produced and is being submitted to correct the anomalous condition in the Revision 1 files. There are no changes to the technical content. Each LTR includes a revisions summary table. The revision bars denoted in the right hand margin of Revision 1 were not changed.

As was done for Revision 1, the subject LTRs are integrated into a single document. The document comprises the SE, each constituent –A report, and the composite RAI responses. The cover page of the document carries the numbering and titling for each of the reports. One affidavit is provided for the integrated report.

Enclosure 1 contains proprietary information of the type that 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 10CFR2.390 and 9.17. Enclosure 2 is the non-proprietary version of Enclosure 1.

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

Sincerely,



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

Project No. 712
Docket No. 99901376

References:

1. Letter from A. Lingenfelter (GNF) to Document Control Desk (USNRC), Accepted Versions of Global Nuclear Fuel – Americas Topical Reports NEDC-33256P, “The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance Part 1 – Technical Bases,” NEDC-33257P, “The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance Part 2 – Qualification,” and NEDC -33528P, “The PRIME Model for Analysis of Fuel Rod Thermal – Mechanical Performance Part 3 – Application Methodology” (TAC # MD4114)), September 15, 2010, MFN 10-046.

Enclosures:

1. The PRIME Model for Analysis of Fuel Rod Thermal–Mechanical Performance: Part 1 –Technical Bases, NEDC-33256P-A, Revision 2, October 2021, Part 2 –Qualification, NEDC-33257P-A, Revision 2, October 2021, Part 3 – Application Methodology, NEDC-33528P-A, Revision 2, October 2021 – GNF-A Proprietary Information
2. The PRIME Model for Analysis of Fuel Rod Thermal–Mechanical Performance: Part 1 – Technical Bases, NEDO-33256-A, Revision 2, October 2021, Part 2 – Qualification, NEDO-33257-A, Revision 2, October 2021, Part 3 – Application Methodology, NEDO-33528-A, Revision 2, October 2021 – Non-Proprietary Information
3. Affidavit dated October 2021

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cc: E Lenning, USNRC NRR/DORL/LLPB
MP Catts, GEH/Wilmington
K Halac, GEH/Wilmington
PLM Specification 006N7655 R0

Document Components:

001 M210112 Cover Letter.pdf

002 M210112 Enclosure 1 Proprietary.pdf

003 M210112 Enclosure 2 Non-Proprietary.pdf

004 M210112 Enclosure 3 Affidavit.pdf