



**HITACHI**

GE Hitachi Nuclear Energy

**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.

**GE Hitachi Nuclear Energy**

**Michelle P. Catts**  
Senior Vice President  
Nuclear Programs

M210156  
December 1, 2021

3901 Castle Hayne Road  
P.O. Box 780 M/C A-18  
Wilmington, NC 28402  
USA

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

T 910 200-9836

**Subject: Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications**

In accordance with Limitation and Condition 4.19 in Reference 1, this letter transmits, for your information, event-specific  $\Delta$ CPR/ICPR biases and uncertainties and peak pressure adders for AOO licensing applications based on generic groupings by BWR type and fuel type. Specifically, this submittal contains  $\Delta$ CPR/ICPR biases and uncertainties and peak pressure adders for specific BWR4/5/6 plants with GNF3 fuel.

GEH has provided similar information in References 2 through 15.

Please note that Enclosure 1 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 3 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GEH. GEH 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.

Enclosure 2 is the non-proprietary version of Enclosure 1.

If you have any questions about the information provided here, please contact me at (910) 200-9836.

Sincerely,

*Michelle P. Catts*

Michelle P. Catts  
Senior Vice President, Nuclear Programs  
Commitments: No additional commitments are made.

Project No. 710

Docket No. 99902024

## References

1. Letter, T. B. Blount (NRC) to J. G. Head (GEH), "Final Safety Evaluation of GE Hitachi Nuclear Energy Americas, LLC Licensing Topical Report NEDE-32906P, Supplement 3, 'Migration to TRACG04/PANAC11 from TRACG02/PANAC10 for TRACG AOO and ATWS Overpressure Transients' (TAC No. MD2569)," MFN 09-548, July 10, 2009.
2. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications for BWR/3 with GE14 Fuel," MFN 11-166, May 27, 2011.
3. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications for BWR/5 with GE14 Fuel," MFN 13-090, October 31, 2013.
4. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," MFN 16-030, May 12, 2016.
5. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," M180061, March 23, 2018.
6. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," M180094, June 12, 2018.
7. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," M180145, July 16, 2018.
8. Letter, J. F. Harrison (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," M180157, July 24, 2018.
9. Letter, Lisa K. Schichlein (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," M190034, February 14, 2019.
10. Letter, Michelle P. Catts (GEH) to NRC Document Control Desk, "Event-Specific  $\Delta$ CPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications," M190198, November 22, 2019.

11. Letter, Michelle P. Catts (GEH) to NRC Document Control Desk, “Event-Specific ΔCPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications,” M200053, April 20, 2020.
12. Letter, Michelle P. Catts (GEH) to NRC Document Control Desk, “Event-Specific ΔCPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications,” M200125, September 8, 2020.
13. Letter, Michelle P. Catts (GEH) to NRC Document Control Desk, “Event-Specific ΔCPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications,” M210016, February 17, 2021.
14. Letter, Michelle P. Catts (GEH) to NRC Document Control Desk, “Event-Specific ΔCPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications,” M210021, March 8, 2021.
15. Letter, Michelle P. Catts (GEH) to NRC Document Control Desk, “Event-Specific ΔCPR/ICPR Biases and Uncertainties and Peak Pressure Adders for AOO Licensing Applications,” M210073, June 9, 2021.

**Enclosures**

1. TRACG Biases, Uncertainties and Statistical Adders - GEH Proprietary Information – Non-Public
2. TRACG Biases, Uncertainties and Statistical Adders - Non-Proprietary Information
3. Affidavit dated December 1, 2021

cc: E Lenning, NRC  
M P Catts, GEH, Wilmington  
PLM Specification 005N5282 Revision 6

**Document Components:**

001 M210156 Cover Letter.pdf  
002 M210156 Enclosure 1 Proprietary.pdf  
003 M210156 Enclosure 2 Non-Proprietary.pdf  
004 M210156 Enclosure 3 Affidavit.pdf