

March 18, 2002

Mr. James F. Mallay  
Director, Regulatory Affairs  
Framatome ANP, Richland, Inc.  
2101 Horn Rapids Road  
Richland, WA 99352

SUBJECT: TOPICAL REPORT BAW-10166P-A, REVISION 4, "BEACH [BEST ESTIMATE ANALYSIS CORE HEAT], APPENDICES H AND I" (TAC NO. MB3866)

- References:
1. Letter, J. F. Mallay (Framatome ANP) to Document Control Desk (NRC), "BAW-10166P-A, Revision 4, 'BEACH, Appendices H and I'," January 25, 2002.
  2. Letter, J. F. Mallay (Framatome ANP) to Document Control Desk (NRC), "Request for Review of Appendices H and I to BAW-10166P-A," December 10, 2001.

Dear Mr. Mallay:

Your letter of January 25, 2002 (Reference 1), clarified the current need for Appendices H and I to BAW-10166P-A, Revision 4, to support the North Anna plant in its forthcoming core loadings with Framatome fuel.

In Reference 1 you stated that BEACH Appendix H provides justification for a higher initial cladding temperature assumption at the start of the reflood. You concluded that since this material is confirmatory in nature, Framatome does not anticipate that the NRC would consider it necessary to conduct a formal review of this appendix. However, in your letter of December 10, 2001 (Reference 2), the title page of Appendix H, BEACH Transfer, states that the proposed appendix is for the purpose of extending the initial cladding temperature restriction imposed in the safety evaluation (SE) for Revision 2. We note that a documented SE restriction can only be changed, replaced or removed by a subsequent NRC review and documented SE. Also, the addition of Appendix H would substantially change BEACH. Therefore, the NRC must review and approve this appendix.

In Reference 1 you stated that BEACH Appendix I provides justification for lower reflood rates than previously approved. You also stated that Framatome is asking for generic approval since the validation is clearly applicable generically. Appendix I will be reviewed for the same reasons as given for Appendix H above. The applicability of Appendix I will be addressed in the NRC review and SE.

Mr. James F. Mallay

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Our current plan is to complete the above review by the end of June 2002. Please contact Drew Holland at (301) 415-1436 if you have any questions.

Sincerely,

**/RA/**

Stuart A. Richards, Director  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Project No. 693

Mr. James F. Mallay

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Sincerely,

**/RA/**

Stuart A. Richards, Director  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

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