



GE ENERGY

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**Subject: Comments re Draft Safety Evaluation for GE Licensing Topical Report,
NEDE-32906P, Rev. 2**

This responds to the Reference 1 NRC request for GE review and comment on the NRC staff's draft Safety Evaluation (SE) for the GE's topical report NEDE-32906P, Revision 2, "TRACG Application for Anticipated Operational Occurrences (AOO) Transient Analyses".

We have reviewed the draft SE provided via Reference 1 and have determined that the draft SE does not contain any GE or GNF proprietary information.

We also provide the following comments regarding the text of the draft SE:

In the third paragraph of Section 1.0 (lines 21–23), the statements regarding the TRACG code require some clarification. While not included in the scope of NEDE-32906P, the TRACG code has been submitted for review for several applications to the ESBWR design and already approved for certain applications to ESBWR (see Reference 2 for one example).

The phrase "The total uncertainty for a figure of merit is characterized by a bias and a standard error...", which begins the third sentence in the second paragraph of Section 2.0 (lines 17&18), is more correctly "The total uncertainty for a figure of merit is characterized by a bias and a standard deviation...".

The reference cited in the last sentence (lines 21–24) of the second paragraph of Section 2.0, and listed in Section 4.0, as Reference 10 was not included in the NEDE-32906P, Rev 2, submittal and is of a type not typically cited in safety evaluations. The use of TGBLA Version 06 and

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PANACEA Version 11 was initiated following approval of Amendment 26 of GESTAR II (Reference 3). Reference 3 or perhaps reference to the appropriate NRC staff technical audit report which documented staff review of the noted Reference 10 is suggested as an alternative citation.

If you have any questions, please contact, Jim Harrison at (910) 675-6604 or myself.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob E. Brown acting for".

Bob E. Brown
General Manager, Regulatory Affairs

Project No. 710

Reference:

1. Letter, S. L. Rosenberg (NRC) to L.M. Quintana (GE), *Draft Safety Evaluation (SE) for General Electric Nuclear Energy (GENE) Topical Report (TR) NEDE-32906P, Revision 2, "TRACG Application for Anticipated Operational Occurrences (AOO) Transient Analyses" (TAC No. MD0249)*, July 12, 2006, (MFN 06-244).
2. Letter, W. D. Beckner (NRC) to L.M. Quintana, *Reissuance of Safety Evaluation Report Regarding Application of General Electric Nuclear Energy's TRACG Code to ESBWR Loss-of-Coolant Accident (LOCA) Analyses (TAC Nos. MB6279, MB6280, MB6281, MB6282, MB6283, MB6801 and MB7255)*, October 28, 2004, (MFN 04-119).
3. Letter, S.A. Richards (NRC) to G.A. Watford (GE), *Amendment 26 to GE Licensing Topical Report NEDE-24011-P-A, "GESTAR II" Implementing Improved GE Steady-State Methods (TAC NO. MA6481)*, November 10, 1999.

cc: JG Anderson (GNF/Wilmington)
MJ Colby (GNF/Wilmington)
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