

# BWR OWNERS' GROUP

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## Proprietary Notice

This letter forwards proprietary information in accordance with 10CFR2.390. Upon removal of Enclosure 1, the balance of this letter may be considered non-proprietary.

Project Number 691

BWROG-07040  
July 31, 2007

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Responses to Requests for Additional Information (RAIs) Dated June 15, 2007, Regarding the BWROG Submittal of General Electric Nuclear Energy (GENE) Licensing Topical Report NEDC-33178P, Revision 0, "General Electric Methodology for Development of Reactor Pressure-Temperature Curves," dated July 2006 (TAC No. MD2693)

**ENCLOSURE:** Responses to RAIs

Dear Sir:

Enclosed please find the BWROG responses (Enclosure) to the NRC Request for Additional Information on the subject Topical Report NEDC-33178P. *[Generic Letter 96-03 indicates that the curve/limits may be relocated outside the technical specifications provided the parameters for constructing the curves/limits are derived using a methodology approved by the NRC. Therefore, licensees need not re-perform the GE analysis provided that they can certify the curves/limits contained in the PTLR were calculated in accordance with the methodology contained in this topical report (once it is approved by NRC) and is in conformance with the guidelines of GL 96-03.]* NRC provided the RAIs for this report by letter dated June 15, 2007. We look forward to your timely review of these responses, and would be happy to meet with you to discuss any remaining issues.

Please note that Enclosure 1 contains proprietary information of the type that GE-Hitachi Nuclear Energy Americas LLC (GEH) maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GEH as indicated in the enclosed affidavit, which also is included in the report. 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 a non-proprietary version of Enclosure 1.

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Should you have additional questions please contact Fred Emerson (BWROG Project Manager) at 910-675-5615 or David Potter (BWROG PTC-GE Committee Chairman) at 763-295-1057.

Sincerely,

A handwritten signature in black ink, appearing to read "R. C. Bunt". The signature is stylized with a large, looped "R" and a cursive "Bunt".

R. C. Bunt  
BWR Owners' Group Chair

cc: D. Coleman, BWROG Vice Chair  
Michelle Honcharik, NRC  
BWROG Primary Representatives  
BWROG PTC-GE Committee  
F. Emerson, GEH