



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

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

Attention: Director, Division of Safety Systems, Office of Nuclear Reactor Regulation

**Subject: NEDC-33257P Supplement 1, “The PRIME Model for Analysis of Fuel Rod Thermal-Mechanical Performance 2015 5-Year Update”**

This letter transmits the demonstration and documentation by Global Nuclear Fuel (GNF) of the continued applicability of PRIME, as required every five years starting in 2015, in compliance with Limitation and Condition 4 in the final Safety Evaluation (SE) for NEDC-33256P, NEDC-33257P, and NEDC-33258P (Reference 1).

Please note that Enclosure 1 contains proprietary information of the type that GNF-A maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GNF-A as indicated in its affidavit, which is also 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 GNF-A. GNF-A 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) 819-6684 or Jim Harrison at (910) 620-1826.

Sincerely,



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

Project No. 712

**Reference:**

1. Thomas B. Blount (NRC) to Andrew A. Lingenfelter (GNF), Subject: Final Safety Evaluation for Global Nuclear Fuel – Americas Topical Reports NEDC-33256P, NEDC-33257P, and NEDC-33258P, “The PRIME Model for Analysis of Fuel Rod Thermal-Mechanical Performance” (TAC No. MD4114), MFN 10-090, January 22, 2010.

**Enclosures:**

1. NEDC-33257P Supplement 1, “The PRIME Model for Analysis of Fuel Rod Thermal-Mechanical Performance 2015 5-Year Update,” GNF Proprietary Information – Class II (Internal)
2. NEDC-33257 Supplement 1, “The PRIME Model for Analysis of Fuel Rod Thermal-Mechanical Performance 2015 5-Year Update,” Non - Proprietary Information – Class I (Public)
3. Affidavit for Enclosure 1

cc:

Director, Division of Safety Systems, Office of Nuclear Reactor Regulation  
J Golla, USNRC  
PL Campbell, GEH/Washington  
JG Head, GEH/Wilmington  
JF Harrison, GEH/Wilmington  
PLM Specifications 002N9474 R1, NEDC-33257\_S1 R0, and NEDC-33257\_S1 R0

001 MFN 15-060 Cover Letter.pdf  
002 MFN 15-060 Enclosure 1 Proprietary.pdf  
003 MFN 15-060 Enclosure 2 Non-Proprietary.pdf  
004 MFN 15-060 Enclosure 3 Affidavit.pdf