

Enclosure 4 to E-44592

List of Additional Changes Not Associated with the RAIs

Minor Changes to NUHOMS® EOS Application

AREVA TN is requesting minor changes to the Safety Analysis Report (SAR) and Technical Specifications (TS) that are unrelated to the RAI questions. The proposed changes will not affect the design functions of any component. These changes are primarily editorial, as discussed with NRC staff in a clarification call on February 10, 2016, to provide clarification or consistency. The requested changes are discussed in the following sections of this enclosure.

1. Changes to the TS

1.1 Correction of Note #3 in TS Figure 2 - EOS-89BTH DSC Heat Load Zoning Configurations and Fuel Qualification

Revise Note #3 to delete reference to TC135. There is nothing in the rest of the figure about TC135. The EOS-89BTH DSC is not loaded in the TC-135.

1.2 Clarification Added to TS LCO 3.1.3 - Time Limit for Completion of DSC Transfer

Add text clarifying that the air circulation system shall “be installed on the transfer skid”. The revised LCO text is listed below with the additional text provided in bold font:

*If the DSC and HLZC combination result in a time limit for completion of transfer from the table below, the air circulation system shall **be assembled** and be verified to be operable within 7 days before commencing the TRANSFER OPERATIONS of the loaded DSC.*

2. Changes to the SAR

2.1 Clarify terminology for yield strength in SAR Section 3.9.6

Delete reference to “dynamic” yield strength in SAR Section 3.9.6. Delete word “dynamic” since there is no difference between the yield strength and the dynamic yield strength (see SAR Section 3.9.6.3.3).

2.2 Revise figure reference in SAR Section 3.9.1.6

In the last sentence of the first paragraph of Section 3.9.1.6, provide a more appropriate figure reference for the strain criteria state of the DSC. Figure 3.9.1-26 has been changed to Figure 3.9.1-27. The revised sentence is: “**Figure 3.9.1-27** shows the strain criteria state of the DSC.”

2.3 Correct typographical error in SAR Section 8.2.5.6

The value for radiation absorbed dose as it applies to the top coat of the DSC support structure needs to be corrected to indicate an exponent for the last number provided. The value of 106 Rad has been corrected to 10^6 rad. The revised sentence is: “*The top coat is expected to experience chalking and other effects of radiation over **10⁶** rad, but the inorganic primer coat is insensitive to radiation.*”

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- 2.4 Mark portions of the titles of certain App 4.9.4 figures as Proprietary in the List of Figures for Appendix 4.9.4.

Portions of the titles of Figures 4.9.4-4 through 4.9.4-7 contain AREVA Inc. proprietary information. The actual figures for these pages are listed as "Proprietary – Trade Secret", however the front matter (Table of Contents, List of Tables and List of Figures) is generally treated as non-proprietary. Because a portion of the figure titles contain Proprietary information, the List of Figures in Appendix 4.9.4 needs to be marked as Proprietary with the relevant proprietary information indicated as appropriate per the 10 CFR 2.390(b)(1)(i) marking guidelines.

- 2.5 Correct subtitle in Figure 6-2 for the Heat Zone Configuration for the EOS-89BTH.

Related to Item 1.1 above, the subtitle for Figure 6-2 needs to be corrected to match the corresponding figure in the Technical Specifications. The EOS-89BTH DSC is not loaded in the TC135. Therefore, the reference to "TC135" in the subtitle of Figure 6-2 is being deleted.

- 2.6 Editorial correction to delete a separate table number (Table 8-34) for the second part of the materials used for the criticality evaluation (Table 8-33).

Table 8-33 is in 2 parts/pages with no need for separate table number. Section 8.2.2.5 has also been revised to delete reference to Table 8-34.