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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Attention: Robert M. Gallo, Chief  
Special Inspection Branch  
Division of Inspection and Support Programs  
Office of Nuclear Reactor Regulation

Subject: Revised Reply to NRC Nonconformance 99900003/96-01-02

- References:
1. Letter R.J. Reda to R.M. Gallo, *Reply to Notice of Nonconformance*, dated October 8, 1996.
  2. Letter R.J. Reda to T.E. Collins, *Proposed Amendment 25 to GE Licensing Topical Report NEDE-24011-P-A (GESTAR II) on Cycle-Specific Safety Limit MCPR*, dated December 13, 1996.

The purpose of this letter is to revise GE's reply to *NRC Inspection Report No. 99900003/96-01*, dated September 10, 1995.

In Reference 1, GE responded to Nonconformance 96-01-02 by stating that it disagreed with the NRC's conclusion that GE failed to search for the design basis statepoint by maximizing the power in an annular region, and that no corrective actions were necessary. GE continues to disagree with the NRC's conclusion since the facts of the specific example that have been cited do not support this conclusion. However, there was opportunity for different interpretations of the annular region requirement because it was not clearly specified in the original GESTAR II document.

In order to enhance the reliability of MCPR safety limit evaluations, GE has implemented corrective and preventive actions to address design basis CPR distributions for cycle-specific safety limit MCPR calculations. GE has revised design procedures to further ensure that a conservative power distribution is used in the Safety Limit MCPR evaluation. In addition, GE has developed specific criteria to measure the conservatism, thereby reducing the opportunity for misinterpretation. Details of this improved design process have been submitted to the NRC as a fulfillment to Corrective Action #3 and are described in Appendix A of Reference 2.

If you have any additional questions, please call me or John Embley at (910) 675-5774.

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