



# HITACHI

## GE Hitachi Nuclear Energy

### 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.

**Michelle P. Catts**  
Senior Vice President  
Regulatory Affairs

3901 Castle Hayne Road  
P.O. Box 780 M/C A-18  
Wilmington, NC 28402  
USA

T 910 200-9836  
[Michelle.Catts@ge.com](mailto:Michelle.Catts@ge.com)

M200074  
May 13, 2020

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

Subject: Fulfillment of Limitation & Condition 23 for NEDC-33173P, "Applicability of GE Methods to Expanded Operating Domains"

By Reference 1, GE Hitachi Nuclear Energy (GEH) proposed an approach to provide completion of Limitation & Condition 23 contained in the final Safety Evaluation (SE) for GE Hitachi Nuclear Energy (GEH) Licensing Topical Report (LTR) NEDC-33173P, "Applicability of GE Methods to Expanded Operating Domains." The Nuclear Regulatory Commission (NRC) concurred with this approach via Reference 2.

Based on the process described in the Reference 1 letter, GEH has been providing nuclear methods performance information, in the Maximum Extended Load Line Limit Analysis Plus (MELLLA+) domain, at annual NRC Technology Update meetings since 2015. As discussed at the 2019 Technology Update, sufficient information is now available to complete this requirement. The enclosure to this letter demonstrates that the Methods performance in the MELLLA+ domain meets expectations set by prior submittals and historical data at non-MELLLA+ conditions. Therefore, the intent of Limitation & Condition 23 has been satisfied and no further reporting is required.

GEH requests that the NRC provide a response indicating concurrence that Limitation & Condition 23 has been satisfied and no further reporting is required.

Please note that Enclosure 1 contains proprietary information of the type that GEH maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GEH as indicated in its affidavit. 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 the non-proprietary version of Enclosure 1.

Sincerely,

*Michelle P. Catts*

Michelle P. Catts  
Senior Vice President, Regulatory Affairs

Commitments: No additional commitments are made.  
Project No. 710  
Docket No. 99902024

**References:**

1. Letter from J. F. Harrison (GEH) to Document Control Desk (US NRC), "Clarification of Limitation and Condition 23 for NEDC-33173P, 'Applicability of GE Methods to Expanded Operating Domains'", MFN 15-066, August 2015.
2. Letter from M. Gavrilas (US NRC) to J. G. Head (GEH), "Response to GE Hitachi Nuclear Energy Letter MFN 15-066 dated August 26, 2015 – Clarification of Limitation and Condition 23 for NEDC-33173P, 'Applicability of GE Methods to Expanded Operating Domains'", (TAC No. MF6665), MFN 15-097, November 2015.

**Enclosures:**

1. Fulfillment of Limitation & Condition 23 for NEDC-33173P – GEH Proprietary Information – Non-Public
2. Fulfillment of Limitation & Condition 23 for NEDC-33173P – Non-Proprietary Information
3. Affidavit for Enclosure 1

cc: N Otto, US NRC  
K Halac, GEH Wilmington  
BR Moore, GNF Wilmington  
G Cuevas-Vivas, GNF Wilmington  
DT Rock, GNF Wilmington  
PLM Specification 003N0054 R1

**Document Components:**

001 M200074 Cover Letter.pdf  
002 M200074 Enclosure 1 Proprietary.pdf  
003 M200074 Enclosure 2 Non-Proprietary.pdf  
004 M200074 Enclosure 3 Affidavit.pdf