



Proprietary Notice

This letter transmits **proprietary information** in accordance with 10 CFR 2.390. Upon removal of Enclosure 3, the balance of the letter may be considered non-proprietary.

Shawn Lamb

GE-Hitachi Nuclear Energy Americas, LLC
Engineering Manager
Radiological and Stability Analysis

3901 Castle Hayne Road
Wilmington, NC 28401
USA

T 910 819-5321
shawn.lamb@gnf.com

M190138
July 31, 2019

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

Subject: GEH Request for a Revision of the GE Model No. 2000 Certificate of Compliance (USA/9228/B(U)-96) to Reintroduce BWR Irradiated Fuel Content

This letter transmits the amendments to Revision 3 of the GE Model No. 2000 (GE2000) Safety Analysis Report (SAR) [Reference 1] to reintroduce GE 10x10 Boiling Water Reactor (BWR) irradiated fuel as part of the approved content. This amendment to Revision 3 of the GE2000 SAR will be incorporated into Revision 4 of the SAR. However, only those impacted sections and pages are provided with this letter. For simplicity, this amendment will be called Revision 4 [Reference 2] throughout the rest of this letter and in the provided enclosures.

GE 10x10 BWR irradiated fuel was originally part of Revision 26 of the GE2000 Certificate of Compliance (CoC) [Reference 3]. This approved content was removed from Revision 27 of the CoC [Reference 4]. The documentation enclosed provides the technical justification for reincluding GE 10x10 BWR irradiated fuel as part of the GE2000 approved content.

Enclosure 1 contains the proprietary affidavit for Enclosure 3 as described below. Enclosure 2 is a detailed list of the amendments made to Revision 3 of the SAR [Reference 1], which are now included in Revision 4. This revision table shows that most of the revised content is limited to Chapters 5, 6, and 7, which are provided in their entirety as part of Enclosure 3. The amendments to other SAR sections listed in Enclosure 2 are purely editorial in nature and are provided as updated pages in Enclosure 3. It should be noted that Enclosure 2 is also included in Revision 4 of the SAR.

Enclosure 3 is the proprietary version of the updated sections and pages to Revision 4 of the SAR. Enclosure 4 is a non-proprietary version of Enclosure 3. Enclosure 4 is a proposed mark-up of the requested changes to Revision 27 of the CoC to be included in CoC Revision 28. Enclosure 4 also serves as a summary guide for the requested GE 10x10 BWR irradiated fuel content.

Please note that Enclosure 3 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 1 identifies that the information contained in Enclosure 3 has been handled and classified as proprietary to GEH. GEH hereby requests that the information in Enclosure 3 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

GEH requests that the NRC issue Revision 28 of the GE2000 CoC with the required GE BWR 10x10 irradiated fuel as part of the approved content within 9 months of this submittal.

If you have any questions about the information provided, please contact either Christopher Kmiec (christopher.kmiec@ge.com) or Erik Kirstein (erik.kirstein@ge.com).

Sincerely,



Shawn Lamb
Engineering Manager, Radiological and Stability Analysis
GE-Hitachi Nuclear Energy Americas, LLC

Docket No. 71-9228

References

1. GE Hitachi Nuclear Energy, NEDO-33866, "Model 2000 Radioactive Material Transport Package Safety Analysis Report," Revision 3, February 2018. United States Nuclear Regulatory Commission ADAMS Accession Number ML18058A112.
2. GE Hitachi Nuclear Energy, NEDE-33866P, "Model 2000 Radioactive Material Transport Package Safety Analysis Report," Revision 4, July 2019.
3. "GE Model No. 2000 Certificate of Compliance No. 9228," Docket Number 71-9228, Revision 26, Package Identification Number USA/9228/B(U)F-96, United States Nuclear Regulatory Commission ADAMS Accession Number ML14245A208.
4. "GE Model No. 2000 Certificate of Compliance No. 9228," Docket Number 71-9228, Revision 27, Package Identification Number USA/9228/B(U)F-96, United States Nuclear Regulatory Commission ADAMS Accession Number ML18102B446.

Enclosures

1. Affidavit
2. Change Summary Table for Enclosures 3 and 4
3. Amended Sections and Pages for NEDE-33866P GE2000 SAR Revision 4 – GEH Proprietary Information – Non-Public
4. Amended Sections and Pages for NEDO-33866 GE2000 SAR Revision 4 – Non-Proprietary Information
5. Proposed GE2000 CoC Revision Mark-ups to be Included in Revision 28 of the CoC

cc: J Golla, NRC
W Allen, NRC
M Catts, GEH Wilmington, NC
S Murray, GEH Wilmington, NC
P McCumbee, GNF Wilmington, NC
C Kmiec, GEH Wilmington, NC
E Kirstein, GNF Wilmington, NC
PLM Specification 005N0660 Revision 0

Document Components:

001-M190138-Cover-Letter.pdf
002-M190138-Enclosure-1-Affidavit.pdf
003-M190138-Enclosure-2-Change-Table-Non-Proprietary.pdf
004-M190138-Enclosure-3-GE2000-SAR-Amendment-Proprietary.pdf
005-M190138-Enclosure-4-GE2000-SAR-Amendment-Non-Proprietary.pdf
006-M190138-Enclosure-5-Rev-27-CoC-Mark-ups.pdf