

Proj. 702



August 20, 2001
NRC:01:035

Document Control Desk
ATTN: Chief, Planning, Program and Management Support Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Request for Review of EMF-2103(P) Revision 0, Realistic Large Break LOCA Methodology for Pressurized Water Reactors

Framatome ANP requests the NRC's review and approval for referencing in licensing actions the topical report EMF-2103(P) Revision 0, Realistic Large Break LOCA Methodology for Pressurized Water Reactors. One CD containing a proprietary version of the report and one CD containing the non-proprietary version of the report are enclosed. We request that the NRC approve this report by September 1, 2002. Framatome ANP plans to apply this methodology to the analysis of the H. B. Robinson plant.

Several documents referenced in the topical report are being provided in a separate transmittal. These documents are intended to facilitate the NRC's review and approval. The computer codes used to execute the methodology and input for a sample problem are also being provided separately.

Framatome ANP intends to make minor modifications to the methodology described in the topical report after its approval. These modifications will facilitate the integration of the fuel designs developed by Siemens Power Corporation and Framatome Cogema Fuels. These changes will extend the range of applicability of the methodology to other plants types (B&W), another fuel cladding type (M5), and an additional fuel rod code (COPERNIC). Since these modifications will be submitted for review and approval soon after the base methodology has been accepted, these planned modifications should be taken into account during the review.

Framatome ANP considers some of the information contained in the enclosed report to be proprietary. As required by 10 CFR 2.790(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

Very truly yours,

James F. Mallay, Director
Regulatory Affairs

- cc: R. Caruso
- R. Landry (w/enclosures)
- N. Kalyanam (w/enclosures)
- J. S. Wermiel Project 702

Framatome ANP Richland, Inc.

| | | |
|-----------------------|------|----------------|
| 2101 Horn Rapids Road | Tel: | (509) 375-8100 |
| Richland, WA 99352 | Fax: | (509) 375-8402 |

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A F F I D A V I T

STATE OF WASHINGTON)
) ss.
 COUNTY OF BENTON)

1. My name is James F. Mallay. I am Director, Regulatory Affairs, for Framatome ANP ("FRA-ANP"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by FRA-ANP to determine whether certain FRA-ANP information is proprietary. I am familiar with the policies established by FRA-ANP to ensure the proper application of these criteria.

3. I am familiar with the FRA-ANP material enclosed in report EMF-2103(P), Revision 0, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," transmitted with letter NRC:01:035, and referred to herein as "Document." Information contained in this Document has been classified by FRA-ANP as proprietary in accordance with the policies established by FRA-ANP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by FRA-ANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Document be withheld from public disclosure.

6. The following criteria are customarily applied by FRA-ANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FRA-ANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FRA-ANP, would be helpful to competitors to FRA-ANP, and would likely cause substantial harm to the competitive position of FRA-ANP.

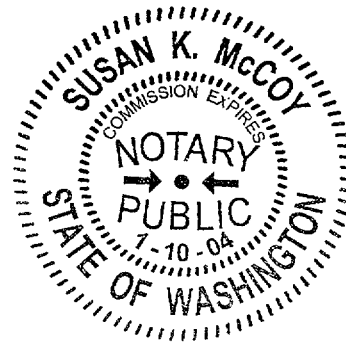
7. In accordance with FRA-ANP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside FRA-ANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRA-ANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

James P. Melly

SUBSCRIBED before me this 23rd
day of August, 2001.



Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/04