

**Attachment 1**

Framatome ANP recently discovered a number of minor errors in the topical report EMF-92-153(P)(A). The errors affect the detailed comparisons to the measured data and the statistical representation of those results. The correlation itself is unaffected by the errors. The 95/95 limit as approved by the NRC is [ ] and the impact of correcting the errors does not change the limit. Since the correlation and the 95/95 DNB limit are unaffected by the errors, Framatome ANP does not plan to revise the topical report and will continue to use the NRC approved 95/95 DNB limit.

The errors included the following:

1. The results for half of the data points in Test 59 were incorrect due to a code input error. In addition, re-evaluation of the data with the error corrected showed that three points were discarded as outliers by Chauvenet's criterion that should have been retained. The data points discarded were Runs 121, 163, and 170.
2. One data point in Test 69 was used twice.
3. One data point was not converged.

The result of correcting the three errors is an increase in the number of data points from [ ] and a modification of the mean and standard deviation of the differences between the calculated results and the measured results. The mean changes from [ ] and the standard deviation changes from [ ]. The safety limit after correcting the errors is [ ], which is unchanged from that approved in the SER ([ ]).

A revised statistical summary of the HTP correlation performance is presented in Table 1. The differences between the summary in the topical report and the summary in Table 1 are due to the errors identified above and due to minor differences between the current version of XCOBRA-IIIC and the version used in EMF-92-153(P)(A).

Framatome ANP will continue using a 95/95 DNB limit of [ ] for analyses with EMF-92-153(P)(A).

**Table 1. Statistical Summary of HTP Correlation Predictions**



## AFFIDAVIT

STATE OF WASHINGTON     )  
                                   ) ss.  
COUNTY OF BENTON        )

1.       My name is Jerald S. Holm. I am Manager, Product Licensing, for Framatome ANP ("FANP"), and as such I am authorized to execute this Affidavit.

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

3.       I am familiar with the FANP attachment to letter NRC:03:010 regarding errors in topical report EMF-92-153(P)(A) and Supplement 1, "HTP: Departure from Nucleate Boiling Correlation for High Thermal Performance Fuel," and referred to herein as "Document." Information contained in this Document has been classified by FANP as proprietary in accordance with the policies established by FANP for the control and protection of proprietary and confidential information.

4.       This Document contain information of a proprietary and confidential nature and is of the type customarily held in confidence by FANP 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 this Document be withheld from public disclosure.

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

- (a) The information reveals details of FANP'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 FANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FANP, would be helpful to competitors to FANP, and would likely cause substantial harm to the competitive position of FANP.

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

8. FANP 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.

Jerald S. Hahn

SUBSCRIBED before me this 23<sup>rd</sup>  
day of January, 2003.

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

