



**FRAMATOME ANP**

An AREVA and Siemens company

**FRAMATOME ANP, Inc.**

June 2, 2003  
NRC:03:036

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

**Submittal of BAW-2241P, Revision 2, Fluence and Uncertainty Methodologies**

Ref.: 1. Letter, NRC to B&WOG, "Acceptance for Referencing Licensing of Topical Report BAW-2241P, Revision, 1, 'Fluence and Uncertainty Methodologies' (TAC No. M98962)," April 5, 2000.

Framatome ANP requests the NRC's review and approval for referencing in licensing actions the topical report BAW-2241P, Revision 2, "Fluence and Uncertainty Methodologies." Since the currently approved revision of this report (Reference 1) applies to pressurized water reactors only, a new Appendix G has been developed to extend this methodology to boiling water reactors. The purpose of this submittal is to gain NRC approval of Appendix G for license applications. Proprietary and non-proprietary copies of Appendix G are enclosed.

This appendix addresses two primary topics. First, the modified methodology is described as it applies to boiling water reactor design, including water density and geometry effects. Second, the development of uncertainties is outlined, including work required to confirm the accuracy of the model.

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 this information from public disclosure.

Very truly yours,

James F. Mallay, Director  
Regulatory Affairs

Enclosures

cc: D. G. Holland (w/enclosures)  
Project 728

T007  
Y601

AFFIDAVIT

COMMONWEALTH OF VIRGINIA )  
  ) ss.  
CITY OF LYNCHBURG            )

1. My name is Gayle F. Elliott. 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 Document, BAW-2241P, Revision 2, 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 contains 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 the Document be withheld from public disclosure.

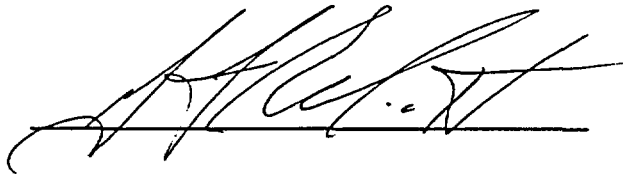
6. The following criteria are customarily applied by FANP to determine whether information should be classified as proprietary:

- (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.

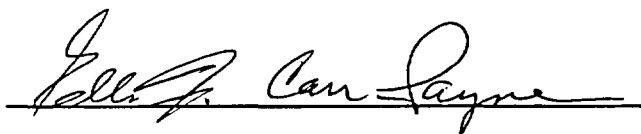
7. In accordance with FANP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside FANP only as required and under suitable agreement providing for nondisclosure and limited use of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

A handwritten signature in black ink, appearing to be "A. H. ...", written over a horizontal line.

SUBSCRIBED before me this 2nd  
day of June, 2003.

A handwritten signature in black ink, reading "Ella F. Carr-Payne", written over a horizontal line.

Ella F. Carr-Payne  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/05

