



**FRAMATOME ANP**

An AREVA and Siemens Company

**FRAMATOME ANP, Inc.**

August 19, 2004  
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Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Request for Review and Approval of BAW-10247(P), "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors"**

Framatome ANP requests the NRC's review and approval of the topical report BAW-10247(P), "Realistic Thermal-Mechanical Fuel Rod Methodology for boiling water reactors." One CD containing a proprietary version of the report and one CD containing a non-proprietary version are enclosed.

This report presents a methodology for the realistic evaluation of the thermal-mechanical performance of fuel rods for Boiling Water Reactors (BWRs), which complies with the requirements of Section 4.2 of NUREG-800.

The methodology consists of the best-estimate fuel performance code RODEX4 that models the thermal-mechanical behavior of the fuel rods, and an application methodology for determining the behavior of rods in a BWR core during normal operation and anticipated operational occurrences. The objective of the methodology is to quantify the fuel design margins relative to the generic design criteria.

Framatome ANP would appreciate the NRC approval of this topical report by December 31, 2005.

Framatome ANP considers some of the material contained in the enclosed documents to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

Very truly yours,

James F. Mallay, Director  
Regulatory Affairs

Enclosures

cc: M. C. Honcharik  
Project 728

T007

**A F F I D A V I T**

STATE OF VIRGINIA        )  
                                  ) ss.  
CITY OF LYNCHBURG        )

1.       My name is James F. Mallay. I am Director, Regulatory Affairs, 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 information contained in topical report BAW-10247(P), "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors" which is 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 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 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.

James F. Mally

SUBSCRIBED before me this 25<sup>th</sup>  
day of August, 2004.

Brenda C. Maddox

Brenda C. Maddox  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 7/31/07

