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Framatome ANP
An Areva and Siemens Company

March 31, 2005
NRC:05:023

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

Request for Review and Approval of Revision 1 of Appendix G to BAW-2241(P), Revision 2, "Fluence and Uncertainty Methodologies"

Ref. 1: Letter, Frank M. Akstulewicz (NRC) to Joe J. Kelly (B&WOG), "Acceptance for Referencing of Licensing 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 of Revision 1 of Appendix G to BAW-2241(P), Revision 2, "Fluence and Uncertainty Methodologies." Since the currently approved revision of this report (Reference 1) applies to pressurized water reactors only, Appendix G was 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.

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.

One CD containing a proprietary version of the report and one CD containing a non-proprietary version of the report are enclosed.

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.

Sincerely,

Jerald S. Holm

Jerald S. Holm, Director
Regulatory Affairs

Enclosures

cc: M. C. Honcharik
Project 728

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AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle F. Elliott. I am Manager, Product Licensing in 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 topical report BAW-2241, Revision 2, Appendix G, Revision 1, "Fluence and Uncertainty Methodologies," dated March of 2005, 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 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 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.

SUBSCRIBED before me this 31st

day of March, 2005.

Brenda C. Maddox

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