



Proj - 728

February 14, 2006
NRC:06:008

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

**Request for Review and Approval of ANP-10256(P) Revision 0, "Methodology for Analysis of Control Rod Withdrawal Error for BWR Plants with ARTS,"
January 2006**

Framatome ANP requests the NRC's review and approval of the topical report ANP-10256(P) Revision 0, "Methodology for Analysis of Control Rod Withdrawal Error for BWR Plants with ARTS." Framatome ANP requests that the NRC complete its review of the topical report by February 2007. A proprietary and non-proprietary version of topical report are provided on the enclosed CDs.

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,

A handwritten signature in cursive script that reads "Ronnie L. Gardner".

Ronnie L. Gardner, Manager
Site Operations and Regulatory Affairs
Framatome ANP, Inc.

Enclosure

cc: G.S. Shukla
Project 728

T007

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Jerald S. Holm. I am Manager, Product Licensing, for Framatome ANP Inc. ("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 the report ANP-10256(P) Revision 0, "Methodology for Analysis of Control Rod Withdrawal Error for BWR Plants with ARTS", 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.

Jerald Holm

SUBSCRIBED before me this 13th
day of February, 2006.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/2008

