

January 30, 2007

70-1201

Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attn: Ms. M. Breeda Reilly

SUBJECT: ANNUAL 10 CFR 70.72(d)(3) UPDATE TO THE AREVA NP MOUNT ATHOS ROAD

INTEGRATED SAFETY ANALYSIS (ISA) SUMMARY AND ANNUAL 70.72(d)(2) SUMMARY OF CHANGES TO THE RECORDS REQUIRED BY 70.62(a)(2)

Reference 1: Letter from Charlie F. Holman to William C. Gleaves, NRC, Subject: Annual 10 CFR

70.72(d)(3) update to the Framatome ANP Mount Athos Road Integrated Safety Analysis (ISA) Summary and annual 70.72(d)(2) brief summary of changes to the

records required by 70.62(a)(2), dated January 25, 2006.

Reference 2: Letter from M. Breeda Reilly, NRC, to Charlie F. Holman, Subject: Framatome ANP,

Inc., Review of annual 10 CFR 70.72 update to the Integrated Safety Analysis Summary and brief summary of changes to the records for calendar year 2005

(TAC L31924), dated March 22, 2006.

Reference 3: Letter from Charlie F. Holman to M. Breeda Reilly, NRC, Subject: Additional

information on annual ISA Summary changes for SNM-1168, Docket 70-1201, dated

April 10, 2006.

Enclosures: I) Affidavit for Request for Information to be Withheld from Public Disclosure

II) List of Effective Page Changes and Description of the Change

III) Revision 4 of the ISA Summary for SNM-1168

IV) Annual 10 CFR 70.72(d)(2) Summary

Dear Ms. Reilly:

On January 25, 2006 AREVA NP Inc. Lynchburg submitted Revision 3 of the ISA Summary for the Mount Athos Road Facility (Reference 1). This submittal was provided as an annual update. On March 22, 2006 additional information was requested by NRC in regards to the January 25, 2006 submittal (Reference 2), and this additional information was submitted by AREVA NP on April 10, 2006 (Reference 3). The additional information requested was in regards to the annual 10 CFR 70.72(d)(2) summary, which summarizes changes to the records required by 10 CFR 70.62(a)(2) (for changes not requiring preapproval under §70.72). This submittal provides the annual update to the ISA Summary and summarizes changes made in the ISA Summary and records required under §70.62(a)(2). This annual update will constitute Revision 4 of the ISA Summary.

Enclosure I provides an affidavit for request for information to be withheld from public disclosure.

Enclosure II provides a list of page changes to Revision 3 of the ISA Summary (January 25, 2006 submittal) with a description of the changes.

AREVA NP INC.

An AREVA and Siemens company

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3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935

NMS201 Add: Brenda Railly Enclosure III provides Revision 4 of the ISA Summary in its entirety. This is being provided in accordance with 10 CFR 70.72(d)(3), which requires that "For all changes that affect the integrated safety analysis summary, the licensee shall submit to NRC annually, within 30 days after the end of the calendar year during which the changes occurred, revised integrated safety analysis summary pages."

Enclosure IV provides a summary of all changes to the ISA records required by 10 CFR 70.62(a)(2) for changes that do not require pre-approval under 10 CFR 10.72. This is being provided in accordance with 10 CFR 70.72(d)(2), which requires that "For changes that do not require pre-approval under §70.72, the licensee shall submit to NRC annually, within 30 days after the end of the calendar year during which the changes occurred, a brief summary of all changes to the records required by §70.62(a)(2) of this subpart."

Please give me a call, 434-832-5276, if you have any questions.

Sincerely

Charlie F. Homan, Manager

Environmental, Health, Safety and Licensing

AREVA NP Inc.

EHSL 07-02

## **Enclosure I**

Affidavit for Request for Information to be Withheld from Public Disclosure

## TRADE SECRETS OR COMMERCIAL INFORMATION

I, Charlie Holman, Environmental, Health, Safety and Licensing Manager at AREVA NP Inc., Lynchburg, Mt. Athos Road (MAR) Fuel Fabrication Facility, that to the best of my knowledge and beliefs, make the following representation contained herein:

A. The following Enclosures which AREVA NP Inc. requests to have withheld from public disclosure are:

SUBJECT:

ANNUAL 10 CFR 70.72(d)(3) UPDATE TO THE AREVA NP MOUNT ATHOS ROAD INTEGRATED SAFETY ANALYSIS (ISA) SUMMARY AND ANNUAL 70.72(d)(2) SUMMARY OF CHANGES TO THE RECORDS REQUIRED BY 70.62(a)(2), Submitted January 30, 2007

- Enclosure II "List of Effective Page Changes and Description of the Change"
- Enclosure III, "Revision 4 of the ISA Summary for SNM-1168"
- Enclosure IV, "Annual 10 CFR 70.72(d)(2) Summary"
- B. The information contained in the document(s) cited in A above has been held in confidence by AREVA NP Inc., in that it contains commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(d). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page, as appropriate, in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of AREVA NP Inc., and as such is customarily held in confidence by AREVA NP Inc. As such, AREVA NP Inc., has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.

The information contained in the document(s) cited in A above has not been made available to public sources by AREVA NP Inc., nor has AREVA NP Inc., authorized that it be made available. In accordance with AREVA NP Inc., policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by AREVA NP Inc. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.

D. The proprietary information that AREVA NP Inc., requests to be withheld from public disclosure is contained in the entire document(s) as so marked.

C.F. Holman

Manager, EHS&L

I certify the above named person appeared before me and executed this document on this the day of January 30,