



September 26, 2007  
NRC:07:049

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

**Changes to AREVA NP's Topical Report BAW-10247(P), "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors"**

Ref.: 1. Letter, James F. Mallay (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of BAW-10247(P), 'Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors'," NRC:04:047, August 19, 2004.

AREVA NP Inc., (AREVA NP) requested the NRC's review and approval of the topical report BAW-10247P, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors" in Reference 1. The purpose of this letter is to propose changes to some of the uncertainties defined in the topical report. The uncertainties used in the methodology are summarized in BAW-10247Q4P, "Response to Request for Additional Information – BAW-10247(P)", Tables C, D, and E. These changes are being proposed based on telephone conversations with the NRC in reaching an agreement to increase uncertainties in specific parameters in order to provide a more conservative bound to the benchmark data.

Attachment A to this letter provides the specific values of the proposed revised uncertainties. A proprietary and a non-proprietary version of Attachment A are provided.

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 black ink, appearing to read 'Ronnie L. Gardner'.

Ronnie L. Gardner, Manager  
Site Operations and Corporate Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: H. D. Cruz  
S. Wu  
Project 728

1007  
NR0

**AREVA NP INC.**  
An AREVA and Siemens company

3315 Old Forest Road, P.O. Box 10935 Lynchburg, VA 24506-0935  
Tel.: 434 832 3000 - Fax: 434 832 3840 - www.aveva.com



requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information".

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

- (a) The information reveals details of AREVA NP'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 AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP'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 AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP 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 S Holm

SUBSCRIBED before me this 25<sup>th</sup>  
day of September, 2007.

Susan K McCoy

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

