



October 23, 2009  
NRC:09:109

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

**Request for COPERNIC Code, Sample Cases and User Manual**

Ref. 1: Letter, James F. Mallay (Framatome ANP, Inc.) to Document Control Desk (NRC), "NRC Review of BAW-10231(P), 'COPERNIC Fuel Rod Design Computer Code'," NRC:02:014, February 25, 2002.

The NRC requested that AREVA NP Inc. (AREVA NP) provide the COPERNIC code (source code and an executable code), sample cases, and the users manual in an email dated July 23, 2009. This information was previously provided to the NRC in Reference 1. A CD is enclosed that contains the requested information.

AREVA NP considers the material contained in the enclosed CD 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.

If you have any questions related to this submittal, please contact Ms. Gayle F. Elliott, Product Licensing Manager, at 434-832-3347 or by e-mail at [gayle.elliott@areva.com](mailto:gayle.elliott@areva.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ronnie L. Gardner'.

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

Enclosures

cc: H. Cruz  
Project 728

**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.areva.com](http://www.areva.com)

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accordance with 10 CFR 2.390. The information for which withholding from disclosure is 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:

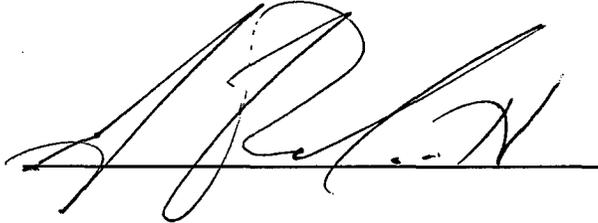
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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.

A handwritten signature in black ink, appearing to be 'R. A. N.', written over a horizontal line.

SUBSCRIBED before me this 15<sup>th</sup>  
day of October 2009.

A handwritten signature in black ink, appearing to be 'Sherry L. McFaden', written over a horizontal line.

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/10  
Reg. # 7079129

