



December 22, 2009  
NRC:09:133

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

**Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors  
Supplement 1: Qualification of RODEX4 for Recrystallized Zircaloy-2 Cladding**

AREVA NP Inc. (AREVA NP) requests the NRC's review and approval for referencing in licensing action BAW-10247PA, Revision 0, Supplement 1P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 1: Qualification of RODEX4 for Recrystallized Zircaloy-2 Cladding."

Proprietary and nonproprietary versions of the topical report are enclosed. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

AREVA requests that the NRC specify in the Safety Evaluation (SE) upon release that Supplement 1 be incorporated into the original document and then issued as Revision 1 of BAW-10247PA.

If you have any questions related to this submittal, please contact Mr. Alan B. Meginnis, Product Licensing Manager at 509-375-8266 or by e-mail at [alan.meginnis@areva.com](mailto:alan.meginnis@areva.com).

Sincerely,

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

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

Enclosures

cc: H. D. Cruz  
Project 728

Y601  
NRR

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

Add: Holly Cruz

**BAW-10247PA, Revision 0, Supplement 1P, Revision 0,  
Realistic Thermal-Mechanical Fuel Rod  
Methodology for Boiling Water Reactors Supplement 1: Qualification of  
RODEX4 for Recrystallized Zircaloy-2 Cladding**

TR Prioritization Scheme Matrix			
*Industry input on shaded areas was not requested.			
Factors	Select the Criteria that the TR Satisfies	Points Assigned for Each Criteria	Total Points (if points are cumulative, total them for each factor in this column)
TR Classification (Points are cumulative)	Generic Safety Issue	6	1
	Emergent Technical Issue	3	
	Standard TR	1	
Applicability (Points are not cumulative)	Industry-Wide Implementation	3	2 (TR is applicable to all BWRs)
	Applicable to entire groups of licensees (BWROG, PWROG, BWRVIP, etc.)	2	
	Applicable only to partial groups of licensees	1	
Specialized Resource Availability (Points are cumulative)	NRC staff expertise is readily available (The NRC staff will evaluate this criteria)	1.5	
	Technical data is available/readily accessible (The NRC staff will evaluate this criteria)	1	
	TR approval is needed by a certain date to support a licensing activity. Explain when and why.	0.5	
Total Points (Add the total points from each factor and total here):			3



in 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), 6(d) and 6(e) 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.

*[Handwritten Signature]*

SUBSCRIBED before me this 22<sup>nd</sup>  
day of December, 2009.

*[Handwritten Signature]*

Susan K. McCoy  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 1/10/12

