

March 26, 2010 NRC:10:023

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

Request for Review and Approval of EMF-93-177(P)(A), Revision 1, Supplement 1(P), Revision 0, "Mechanical Design for BWR Fuel Channels Supplement 1: Advanced Methods for New Channel Designs"

AREVA NP Inc. (AREVA NP) requests the NRC's review and approval for referencing in licensing action EMF-93-177(P)(A), Revision 1, Supplement 1(P), Revision 0, "Mechanical Design for BWR Fuel Channels Supplement 1: Advanced Methods for New Channel Designs."

Proprietary and nonproprietary versions of the topical report are enclosed. AREVA NP considers some of the material contained in the report 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.

In support of the Office of Nuclear Reactor Regulation's prioritization efforts, the prioritization scheme matrix was completed and is attached for your use.

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 <u>alan.meginnis@areva.com</u>.

Sincerely,

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

Enclosures

cc: H. D. Cruz Project 728

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AREVA NP INC.

An AREVA and Siemens company

ATTACHMENT A

EMF-93-177(P)(A), Revision 1, Supplement 1(P), Revision 0, Mechanical Design for BWR Fuel Channels Supplement 1: Advanced Methods for New Channel Designs

TR Prioritization Scheme Matrix *Industry input on shaded areas was not requested.			
Factors	Select the Criteria that the TR Satisfies	d areas was not re Points Assigned for Each Criteria	Total Points (if points are cumulative, total them for each factor in this column)
TR Classification (Points are	Generic Safety Issue	6	1
cumulative)	Emergent Technical	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

AFFIDAVIT

STATE OF WASHINGTON)) ss. COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in the report EMF-93-177(P)(A), Revision 1, Supplement 1(P), Revision 0, "Mechanical Design for BWR Fuel Channels Supplement 1: Advanced Methods for New Channel Designs," dated March 2010 and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP 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 AREVA NP 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. The request for withholding of proprietary information is made 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.

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SUBSCRIBED before me this ______ 2 5 day of Marc __, 2010.

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

