



October 29, 2010
NRC:10:099

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

Information in Support of the EPRI Materials Reliability Program (MRP): Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MPR-227-Rev. 0) Review

AREVA NP Inc. (AREVA) is hereby providing the enclosed Engineering Information Record, Document Number 51-9038244-002, entitled "Update of Irradiation Embrittlement in BAW-10008 Part 1 Rev. 1" to the NRC for information. This document is provided to the NRC in support of the EPRI Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MPR-227-Rev. 0) review. This document demonstrates that for the irradiation levels at the end of 60-year lifetime, there will be adequate ductility at operating temperature to absorb local strains at the regions of maximum stress intensity, and that irradiation will not adversely affect deformation limits.

This document is being submitted for information only. No safety evaluation (SE) is expected and therefore, no review fees should be incurred.

The non-proprietary report, AREVA Document Number 47-9048125-002, is being provided under a separate submittal through the EPRI MRP.

AREVA considers some of the material contained in the enclosed document 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 Elliott, Product Licensing Manager. She may be reached by telephone at 434-832-3347, or by e-mail at gayle.elliott@areva.com.

Sincerely,

A handwritten signature in black ink that reads "Ronnie L. Gardner".

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

Enclosure

cc: H. D. Cruz
Project 728

4601
NRC

AREVA NP INC.

An AREVA and Siemens company

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.

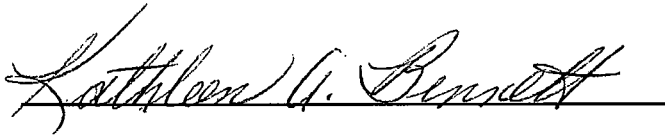
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited 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 cursive script, appearing to be 'J.P.A.', written over a horizontal line.

SUBSCRIBED before me this 27th
day of October 2010.

A handwritten signature in cursive script, reading 'Kathleen A. Bennett', written over a horizontal line.

Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/11
Reg. # 110864

