



August 10, 2011  
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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk (03-H8)  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

**Subject: AREVA NP Inc. (Richland) Summary of Facility Changes Made during Calendar Year 2010 Update**

Enclosed is a summary of a facility change made during 2010 which did not require NRC pre-approval that was inadvertently left out of the annual summary of changes AREVA NP previously submitted for 2010. We have entered this oversight issue into our Corrective Action Program for evaluation and establishment of preventive measures going forward.

This summary is being submitted in accordance with 10 CFR 70.72 (d)(2). AREVA NP requests that this update be withheld in its entirety from public disclosure in accordance with 10 CFR 2.390 or 10 CFR 2.790 in that it contains information that is either commercially proprietary in nature or contains security-related information.

Technical contact information relative to the Richland Site ISA is as follows:

AREVA NP Inc.  
Attn: Calvin D. Manning, Manager  
Nuclear Criticality Safety  
2101 Horn Rapids Road  
Richland, WA 99354  
Phone: 509-375-8237  
Email: [calvin.manning@areva.com](mailto:calvin.manning@areva.com)

Additionally, I can be reached at 509-375-8409 or via email at [robert.link@areva.com](mailto:robert.link@areva.com).

Very truly yours,

A handwritten signature in black ink that reads "Robert Link".

R. E. Link, Manager  
Environmental, Health, Safety & Licensing

c: Marilyn Diaz, NRC  
Mary Thomas, NRC

*MISSO  
MISS*

**AREVA NP INC.**

2101 Horn Rapids Road, Richland, WA 99354  
Tel.: 509 375 8100 [www.aveva.com](http://www.aveva.com)

# AFFIDAVIT

STATE OF WASHINGTON     )  
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COUNTY OF BENTON     )     ss

**Robert E. Link**, being duly sworn on oath, states as follows:

1. I am employed by AREVA NP Inc. (AREVA NP) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at AREVA NP's Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the contents of the "Part 2 - Chapter 20 Ancillary Systems" of the ISA Summary that was inadvertently left off out the annual summary of changes that AREVA NP previously submitted for 2010. The AREVA NP Inc., Richland, Washington Fuel Fabrication Facility "Annual Summary Update of Facility Changes" provides the annual listing of changes to the Richland Site as required by 10CFR70.72 (d)(2). This Annual Summary Update has been classified and designated as "Proprietary" by AREVA NP in accordance with the document control system and policies established by AREVA NP for the control and protection of proprietary and confidential information.

3. AREVA NP is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as AREVA NP.

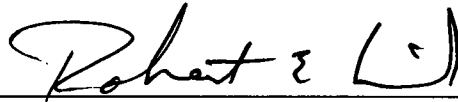
Competition among these companies including AREVA NP is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The Annual Summary of Facility Changes contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in the Annual of Facility Changes Summary is commercial and confidential because it:

- A. Reveals distinguishing aspects of AREVA NP's manufacturing processes by relating sequences of operations and/or sub-operations to optimize the efficiency and performance of manufacturing operations which a competitor within the field of nuclear fuel manufacturing may adapt for their own processes, reducing the competitor's expenditure of resources to achieve the same efficiencies, thereby gaining a competitive advantage to the disadvantage of AREVA NP.
- B. Reveals aspects of privately funded development of process controls and parameters derived by AREVA NP over the course of optimizing the performance of waste treatment and other processes.
- C. Reveals technical rationale developed by AREVA NP relating to plant layout, structure, process flow and other technical information which a competitor could readily use without expenditure of funds and replicate in its facilities thereby gaining a competitive advantage to the disadvantage of AREVA NP.

5. AREVA NP Inc. will suffer considerable competitive harm if the contents of the Annual Summary of Facility Changes are made available to AREVA NP domestic and international competitors.

Dated this 10<sup>th</sup> day of August, 2011

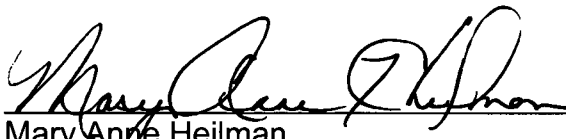


Robert E. Link  
Manager, Environmental, Health, Safety and Licensing

STATE OF WASHINGTON )  
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COUNTY OF BENTON    )        SS

On this 10<sup>th</sup> day of August 10, 2011, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Robert E. Link to me known to be the Manager, Environmental, Health, Safety and Licensing of AREVA NP Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.



Mary Anne Heilman  
Notary Public in and for the State of Washington,  
residing at Benton, Washington.  
MY COMMISSION EXPIRES: June 9, 2012

