

September 27, 2011

NRC:11:093

U.S. Nuclear Regulatory Commission Attn: Ms. Tracy J. Orf (Mail Stop – 8G9A) One White Flint North 11555 Rockville Pike Rockville, Md. 20852-2738

Material to Support St. Lucie Nuclear Power Plant, Unit 1, Extended Power Uprate (EPU) License Application, Docket No. 50-335, Operating License No. DPR-67

The NRC requested additional information to support the St. Lucie Nuclear Power Plant, Unit 1, License Application for an Extended Power Uprate. The enclosed input deck for fuel rod performance calculations using FRAPCON-3 supports this request

AREVA NP Inc. considers the material contained in the attachment to be proprietary in full. 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.

Pedro Salas, Manager Corporate Regulatory Affairs

AREVA NP Inc.

Enclosure

cc: H. D. Cruz Project 728

> 4001 NRR

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)	SS
CITY OF LYNCHBURG)	

- 1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.
- 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 CD submitted to the NRC on September 27, 2011 via NRC:11:093, to support St. Lucie Unit 1 EPU License Application, Docket No. 50-335 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) 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.

SUBSCRIBED before me this 27th

Sherry L. McFaden

NOTÁRY PUBLIC, COMMONWEALTH OF VIRGINIA

MY COMMISSION EXPIRES: 10/31/14

Reg. # 7079129

SHERRY L. MCFADEN **Notary Public** Commonwealth of Virginia 7079129

My Commission Expires Oct 31, 2014