BSEP 12-0031 Enclosure 11

AREVA Document No. 51-9177315-000, "Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology - Operability Assessment (Nonproprietary Version)"

.





20004-018 (10/18/2010)

AREVA NP Inc.

ENGINEERING INFORMATION RECORD

Document No: 51 - 9177315 - 000

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

Page 1 of 10

Classifier or street



Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

Safety Related? Does this document Does this document	⊠ YES : contain a : contain C	NO ssumptions requiring ustomer Required F	g verification?	YES NO	NO D						
Signature Block											
Name and Title/Disciplir	16	Signature	P/LP, R/LR, A/A-CRF, A/A-CRI	Date	Pages/Sections Prepared/Reviewed/ Approved or Comments						

nue/Discipline	Signature	AAON	Dale	Approved of Comments
D.G. Carr, Supervisor	sould be lan	Р	2/14/2012	All
D.R. Tinkler, Engineer Thermal-Hydraulics Richland	DIR.	R	2/17/12	All
D.W. Pruitt, Manager C Thermal-Hydraulics Richland	0,082	A/A-CRI	בואדוב	All
A.B. Meginnis, Manager Product Licensing	Min & Mari	A	2/20/12	A11

Note: P/LP designates Preparer (P), Lead Preparer (LP) R/LR designates Reviewer (R), Lead Reviewer (LR) A/A-CRF designates Approver (A), Approver of Customer Requested Format (A-CRF) A/A-CRI designates Approver (A), Approver - Confirming Reviewer Independence (A-CRI)

Record of Revision

Revision	Pages/Sections/	Brief Description /
No.	Paragraphs Changed	Change Authorization
000	All	Initial issue of document

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

1.0 Purpose

Reference 1 presents an AREVA methodology for determining the safety limit minimum critical power ratio (SLMCPR) that was recently approved by the NRC. The methodology is an update or extension of the previously approved methodology presented in Reference 2. The SLMCPR methodology was updated to incorporate full implementation of the ACE critical power correlation (References 3 and 4), a realistic fuel channel bow model (Reference 5), and expanded coupling with the MICROBURN-B2 core simulator (Reference 6). More detailed descriptions of these improvements are discussed in Reference 1.

Reference 7 presents results of the Brunswick Unit 1 Cycle 19 (BRK1-19) SLMCPR analysis using the currently approved Reference 4 ACE/ATRIUM [™] 10XM* critical power correlation. As discussed in Reference 8, a concern was identified in the calculation of the K-factor within the approved ACE/ATRIUM 10XM correlation. The K-factor methodology was modified in response to the deficiencies found in the axial averaging process. An updated correlation for use in the Brunswick SLMCPR operability assessment calculations with ATRIUM 10XM fuel is described in Reference 8.

The purpose of this report is to present results of an operability assessment for the BRK1-19 SLMCPR calculations presented in Reference 7 using the updated critical power correlation described in Reference 8 for the ATRIUM 10XM fuel. The results of this analyses support a change in the list of approved methodologies in the Technical Specifications and also a change in the Technical Specification SLMCPR values for two-loop operation (TLO) and single-loop operation (SLO).

2.0 Methodology

The analysis presented in this document used the methodology presented in Reference 1 and the operability assessment critical power correlation presented in Reference 8 for the ATRIUM 10XM fuel. The SLMCPR is defined as the minimum value of the critical power ratio which ensures that at least 99.9% of the fuel rods in the core are expected to avoid boiling transition during normal operation or an anticipated operational occurrence (AOO). The SLMCPR is determined using a statistical analysis that employs a Monte Carlo process that perturbs key input parameters used in the calculation of MCPR. The set of uncertainties used in the statistical analysis include both fuel-related and plant-related uncertainties.

The SLMCPR analysis is performed with a power distribution that conservatively represents expected reactor operating states that could both exist at the operating limit MCPR (OLMCPR) and produce a MCPR equal to the SLMCPR during an AOO. [

^{*} ATRIUM is a trademark of AREVA NP.

51-9177315-000

] is

[

]

In the AREVA methodology, the effects of channel bow on the critical power performance are accounted for in the SLMCPR analysis. Reference 1 discusses the application of a realistic channel bow model.

3.0 Analysis

The core loading and cycle depletion from the BRK1-19 fuel cycle design report (Reference 9) was used as the basis of the SLMCPR analysis. Figure 1 presents the core loading including the assembly type, the cycle the fuel was originally loaded, and the number of assemblies. The BRK1-19 core is made up of ATRIUM 10XM and ATRIUM-10 fuel. Analyses were performed [

] for the Brunswick power/flow map for MELLLA operation as shown in Figure 2. The BSP regions shown in the power/flow map are based on the methods discussed in Reference 10. The radial power distribution [

presented in Figure 3.

The operability assessment critical power correlation is used for the ATRIUM 10XM fuel while the SPCB critical power correlation (Reference 11) is used for the ATRIUM-10 fuel.

The fuel- and plant-related uncertainties used in the BRK1-19 SLMCPR analysis are presented in Table 1. The radial and nodal power uncertainty used in the analysis include the effects of up to 40% of the TIP channels out-of-service, up to 50% of the LPRMs out-of-service, and a 2500 effective full power hour (EFPH) LPRM calibration interval.

The BRK1-19 SLMCPR analysis supports a TLO SLMCPR of 1.07 and an SLO SLMCPR of 1.09. Table 2 presents a summary of the analysis results including the SLMCPR and the percentage of rods expected to experience boiling transition. The percentages of the total number of fuel rods predicted to experience boiling transition in the overall Monte Carlo statistical evaluation associated with each nuclear fuel type are presented in Table 3. The results are for the [

]

4.0 Discussion of Results

Results from Reference 7 based on the currently approved ACE/ATRIUM 10XM critical power correlation (Reference 4) are presented in Table 4. They are based on the same BRK1-19 design step-through and most of the same fuel- and plant-related uncertainties. The one exception is a slightly higher additive constant uncertainty associated with the currently approved correlation for the ATRIUM 10XM fuel – []. A comparison of results shows

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

a decrease in the number of rods expected to experience boiling transition in both TLO and SLO with the use of the operability assessment correlation. The same SLMCPR limits are supported with both the currently approved ACE correlation (Reference 4) and the operability assessment correlation.

5.0 References

- 1. ANP-10307PA Revision 0, AREVA MCPR Safety Limit Methodology for Boiling Water Reactors, AREVA NP, June 2011.
- 2. ANF-524(P)(A) Revision 2 and Supplements 1 and 2, ANF Critical Power Methodology for Boiling Water Reactors, Advanced Nuclear Fuels Corporation, November 1990.
- 3. ANP-10249PA Revision 1, *ACE/ATRIUM-10 Critical Power Correlation*, AREVA NP, September 2009.
- 4. ANP-10298PA Revision 0, ACE/ATRIUM 10XM Critical Power Correlation, AREVA NP, March 2010.
- 5. BAW-10247PA Revision 0, *Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors*, AREVA NP, February 2008.
- 6. EMF-2158(P)(A) Revision 0, Siemens Power Corporation Methodology for Boiling Water Reactors: Evaluation and Validation of CASMO-4 / MICROBURN-B2, Siemens Power Corporation, October 1999.
- 7. 51-9175814-000, "Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology (Proprietary Version)," AREVA NP, February 2012.
- 8. ANP-3086(P), Brunswick Unit 1 and Unit 2 SLMCPR Operability Assessment Critical Power Correlation for ATRIUM 10XM Fuel - Improved K-factor Model, AREVA NP, February 2012.
- 9. ANP-3005(P) Revision 0, *Brunswick Unit 1 Cycle 19 Fuel Cycle Design*, AREVA NP, June 2011.
- 10. 0G02-0119-260, Backup Stability Protection (BSP) for Inoperable Option III," GE Nuclear Energy, July 27, 2002.
- 11. EMF-2209(P)(A) Revision 3, SPCB Critical Power Correlation, AREVA NP, September 2009.
- 12. EMF-2493(P), *MICROBURN-B2* Based Impact of Failed/Bypassed LPRMs and TIPs, Extended LPRM Calibration Interval, and Single Loop Operation on Measured Radial Bundle Power Uncertainty, AREVA NP, December 2000.
- 13. NEDO-20340, *Process Computer Performance Evaluation Accuracy*, General Electric, June 1974.
- 14. NEDO-10958-A, General Electric BWR Thermal Analysis Basis (GETAB): Data, Correlation and Design Application, General Electric, January 1977.
- 15. NEDO-24344, *Brunswick Steam Electric Plant Units 1 and 2 Single-Loop Operation*, General Electric, September 1981.
- Letter, H.D. Curet (AREVA) to H.J. Richings (NRC), "POWERPLEX Core Monitoring: Failed or Bypassed Instrumentation and Extended Calibration," HDC:96:012, May 6, 1996 (38-9043714-000).
- 17. 0B21-1305 Revision 1, "Core Monitoring LPRM Uncertainty and Sensitivity Decay," Progress Energy, March 2009 (NRC Accession Number ML092370285).

Page 5

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

Table 1 Fuel- and Plant-Related Uncertainties for BRK1-19 SLMCPR Analyses										
Parameter	Uncertainty	Reference								
Fuel-Related Uncertainties										
ſ										
· 										
]								
Plant-Related	Uncertainties	J								
Feedwater flow rate	1.8% [‡]	14								
Feedwater temperature	0.8% [‡]	14								
Core pressure	0.8% ^{‡.§}	13								
Total core flow rate TLO SLO	2.5% 6.0%	14 15								

1

^{*[}

[†] Values from Reference 12 are a result of the application of the methodology discussed in Reference 16 to the base uncertainties presented in Reference 6. The uncertainties presented support operation with up to 50% of LPRMs out-of-service, up to 40% of the TIP channels out-of-service, and a 2500 EFPH LPRM calibration interval. The bases of these values include a core monitoring LPRM detector uncertainty of 4.3% from Reference 17.

[‡] Referenced plant uncertainties were rounded up to the nearest 0.1% before use.

S The core pressure uncertainty is taken in Reference 13 to be a more conservative value than accepted in Reference 14; therefore, the more conservative value is used.

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

Table 2 BRK1-19 Results Summary
for SLMCPR Analysis
(Operability Assessment CPR Correlation
for ATRIUM 10XM)SLMCPRPercentage of Rods
in Boiling TransitionTLO – 1.070.051SLO – 1.090.053

Table 3 Contribution of Total Predicted Rods in BT by Nuclear Fuel Type											
Nuclear Fuel	Fuel Design	Burnup Status	Contribution of Total Roc Predicted To Be in BT (%)								
Туре	200.9.1	Clarac	TLO	SLO							
30	ATRIUM-10	Twice burned	[
31	ATRIUM-10	Twice burned		· · · ·							
32	ATRIUM-10	Once burned									
33	ATRIUM-10	Once burned									
34	ATRIUM 10XM	Fresh									
35	ATRIUM 10XM	Fresh]							

Table 4 BRK1-19 Results Summary for SLMCPR Analysis (Reference 4 ACE/ATRIUM 10XM CPR Correlation)									
SLMCPR	Percentage of Rods in Boiling Transition								
TLO – 1.07	0.073								
SLO – 1.09	0.083								

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

	J:	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
I:																											
1										31	31	30	30	31	30	30	30	31	31								
2									30	32	32	32	32	32	32	32	32	32	32	31							
3						31	30	31	32	32	34	33	34	34	34	34	33	34	32	32	31	30	31				
4					31	31	32	32	34	34	34	34	34	33	33	34	34	34	34	34	32	32	30	31			
5				31	30	32	34	33	34	35	33	35	33	35	35	33	35	33	35	34	33	34	32	30	31		
6				30	32	34	32	34	34	33	35	33	35	33	33	35	33	35	33	34	34	32	34	32	31		
7				30	32	33	34	35	33	35	33	35	33	35	35	33	35	33	35	33	35	34	33	32	31		
8			31	32	34	34	34	33	35	33	35	33	35	33	33	35	33	35	33	35	33	34	34	34	32	31	
9		30	32	32	34	35	33	35	33	35	33	35	33	35	35	33	35	33	35	33	35	33	35	34	32	32	30
10		31	32	34	34	33	35	33	35	33	35	33	35	33	33	35	33	35	33	35	33	35	33	34	34	32	31
11		30	32	33	34	35	33	35	33	35	33	35	33	35	35	33	35	33	35	33	35	33	35	34	33	32	30
12		30	32	34	34	33	35	33	35	33	35	33	35	33	33	35	33	35	33	35	33	35	33	34	34	32	31
13		30	32	34	33	35	33	35	33	35	33	35	33	33	35	33	35	33	35	33	35	33	35	33	34	32	30
14		31	32	34	33	35	33	35	33	35	33	35	33	35	33	33	35	33	35	33	35	33	35	33	34	32	30
15		30	32	34	34	33	35	33	35	33	35	33	35	33	33	35	33	35	33	35	33	35	33	34	34	32	31
16		30	32	33	34	35	33	35	33	35	33	35	33	35	35	33	35	33	35	33	35	33	35	34	33	32	30
17		31	32	34	34	33	35	33	35	33	35	33	35	33	33	35	33	35	33	35	33	35	33	34	34	32	31
18		30	32	32	34	35	33	35	33	35	33	35	33	35	35	33	35	33	35	33	35	33	35	34	32	32	31
19			31	32	34	34	34	33	35	33	35	33	35	33	33	35	33	35	33	35	33	34	34	34	32	31	
20				30	32	33	34	35	33	35	33	35	33	35	35	33	35	33	35	33	35	34	33	32	31		
21				30	32	34	32	34	34	33	35	33	35	33	33	35	33	35	33	34	34	32	34	32	30		
22				31	31	32	34	33	34	35	33	35	33	35	35	33	35	33	35	34	33	34	32	30	31		
23					31	30	32	32	34	34	34	34	34	33	33	34	34	34	34	34	32	32	30	31			
24						31	30	31	32	32	34	33	34	34	34	34	33	34	32	32	31	30	31				
25									31	32	32	32	32	32	32	32	32	32	32	31							
26										31	31	31	30	30	31	30	30	31	30								
		1	2	з	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26

Nuclear Fuel Type	Fuel Description	Cycle Loaded	Number of Assemblies
30	ATRIUM-10	17	38
31	ATRIUM-10	17	46
32	ATRIUM-10	18	80
33	ATRIUM-10	18	162
34	ATRIUM 10XM	19	96
35	ATRIUM 10XM	19	138

Figure 1 Brunswick Unit 1 Cycle 19 Core Loading Map





Figure 2 Brunswick Unit 1 Power/Flow Map With Nominal Feedwater Temperature BSP Regions

51-9177315-000

Brunswick Unit 1 Cycle 19 SLMCPR Analysis With SAFLIM3D Methodology – Operability Assessment (Nonproprietary Version)

_

_	J: 1	2	3	4	5	6	7	8	9	10	11	12	13
1: 1									0.326	0.377	0.417	0.430	0 437
2								0.418	0.618	0.713	0.758	0.786	0.800
3					0.280	0.386	0.519	0.737	0.876	1.104	0.943	1.161	1.165
4				0.313	0.486	0.695	0.830	1.119	1.229	1.280	1.300	1.300	1.073
5			0.273	0.489	0.770	1.045	0.969	1.281	1.332	1.122	1.360	1.112	1.319
6			0.371	0.698	1.047	1.048	1.304	1.357	1.143	1.371	1.132	1.322	1.048
7			0.515	0.834	0.980	1.305	1.357	1.151	1.384	1.147	1.354	1.058	0.987
8		0.428	0.738	1.121	1.281	1.357	1.148	1.377	1.146	1.358	1.103	1.263	0.814
9	0.325	0.621	0.878	1.228	1.331	1.148	1.390	1.154	1.343	1.094	1.293	1.041	1.225
10	0.387	0.716	1.103	1.278	1.129	1.370	1.147	1.334	1.045	1.234	1.033	1.257	1.045
11	0.401	0.753	0.942	1.299	1.356	1.136	1.358	1.068	0.949	0.776	1.186	1.026	1.260
12	0.428	0.783	1.162	1.304	1.126	1.360	1.127	1.258	0.783	0.909	0.969	1.222	1.020
13	0.431	0.801	1.169	1.087	1.355	1.135	1.329	1.049	1.183	0.957	1.205	1.010	1.014
14	0.439	0.800	1.169	1.087	1.356	1.137	1.331	1.054	1.190	0.966	1.213	1.024	1.242
15	0.430	0.783	1.163	1.305	1.128	1.362	1.131	1.270	0.810	0.944	0.984	1.239	1.029
10	0.401	0.753	0.943	1.300	1.358	1.139	1.364	1.080	0.986	0.812	1.203	1.039	1.266
10	0.3/9	0.715	1.104	1.279	1.130	1.3/3	1.143	1.344	1.062	1.250	1.043	1.264	1.049
10	0.325	0.620	0.8/8	1 1 2 2 9	1.333	1.150	1.394	1.159	1.350	1.099	1,299	1.051	1.227
20		0.450	0.740	1,121	1.202	1 206	1 250	1 152	1 204	1.301	1 266	1.204	0.010
20			0.384	0.034	1 047	1 051	1 304	1 357	1 1 3 9	1 370	1 1 3 2 2	1 321	1 0/19
22			0.304	0.097	0 769	1 044	1.304	1 280	1 331	1 120	1 350	1 110	1 317
23			0.209	0.405	0.709	0 695	0.900	1 117	1 227	1 279	1 299	1 298	1 073
24				0.000	0.272	0.382	0 504	0 735	0 874	1 103	0 942	1 161	1 165
25					0.2.2	0.302	0.004	0 412	0 617	0 712	0 758	0 785	0 801
26								•••==	0.324	0.378	0.411	0.429	0.443
	1	2	3	4	5	6	7	8	9	10	11	12	13
	J:14	15	16	17	18	19	20	21	22	23	24	25	26
I:				_									
1	0.439	0.433	0.411	0.380	0.329								
2	0.799	0.783	0.755	0.711	0.617	0.429							
З	1.164	1.160	0.940	1.103	0.875	0.736	0.520	0.393	0.274				
4	1.072	1.299	1.300	1.280	1.229	1.119	0.830	0.695	0.486	0.309			
5	1.318	1.113	1.360	1.120	1.333	1.282	0.969	1.043	0.767	0.486	0.271		
6	1.048	1.323	1.132	1.372	1.143	1.359	1.304	1.046	1.044	0.693	0.382		
7	0.987	1.058	1.356	1.140	1.386	1.149	1.358	1.304	0.967	0.828	0.519		
8	0.814	1.264	1.108	1.361	1.147	1.380	1.148	1.357	1.280	1.117	0.734	0.424	
9	1.226	1.042	1.296	1.098	1.345	1.152	1.391	1.144	1.331	1.226	0.872	0.615	0.325
10	1.045	1.260	1.034	1.238	1.040	1.335	1.143	1.372	1.127	1.278	1.101	0.709	0.378
11	1.263	1.028	1.190	0.778	0.949	1.066	1.359	1.134	1.358	1.300	0.940	0.754	0.407
12	1.025	1.233	0.970	0.908	0.779	1.258	1.122	1.362	1.124	1.305	1.163	0.782	0.442
13	1.240	1.017	1.203	0.952	1.178	1.044	1.328	1.131	1.356	1.085	1.169	0.799	0.437
14	1.011	1.009	1.200	0.951	1.177	1.043	1.328	1.131	1.356	1.086	1.169	0.800	0.437
15	1.018	1.220	0.965	0.906	0.778	1.256	1.122	1.361	1.124	1,305	1.163	0.783	0.441
17 17	1 045	1 257	1 020	1 225	0.94/	1 22/	1 1 26	1 271	1 1 25/	1.300	1 101	0.755	0.40/
10 10	1 225	1 040	1 202	1 000	1 3/3	1 1 5 2 4	1 200	1 1/4	1 221	1 226	1.101	0./10	0.3/8
10	0 913	1 261	1 101	1 257	1 1 1 1 1	1 270	1 1 / 0	1 250	1 201	1 110	0.0/3	0.010	0.323
20	0.013	1.201	1 353	1 136	1 38/	1 1/0	1 250	1 306	1.201	1.110	0.734	0.423	
20	1 046	1 320	1 1 2 7	1 370	1 142	1 360	1 307	1 049	1 046	0.029	0.386		
22	1.317	1.110	1,359	1,117	1,334	1.284	0.979	1.046	0 768	0 485	0.274		
23	1,071	1.298	1.299	1.280	1.230	1.122	0.831	0.696	0.489	0.310	V. 2 / 3		
24	1.164	1.160	0.938	1.104	0.876	0.737	0.521	0.388	0.273				
25	0.799	0.784	0.756	0.712	0.619	0.431			5.2.5				
26	0.440	0.434	0.419	0.381	0.333								
	14	15	16	17	18	19	20	21	22	23	24	25	26
					-		_						
				Fig	gure 3	Radial	Power	Distrib	ution fo	or			

Brunswick Unit 1 Cycle 19 SLMCPR [] With Operability Assessment CPR Correlation

BSEP 12-0031 Enclosure 13

AREVA Affidavit Regarding Withholding AREVA Document No. 51-9175787-000, "Brunswick Unit 2 Cycle 20 SLMCPR Analysis With SAFLIM3D Methodology (Proprietary Version)" from Public Disclosure

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 51-9175787-000, "Brunswick Unit 2 Cycle 20 SLMCPR Analysis With SAFLIM3D Methodology (Proprietary Version)," dated February 2012 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.

ac & Mag

SUBSCRIBED before me this _____ day of Fabruar, 2012.

U

Susan K. McCoy NOTARY PUBLIC, STATE OF WASHINGTON MY COMMISSION EXPIRES: 1/14/2016

