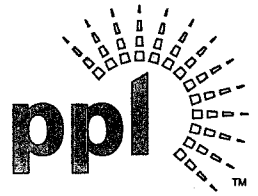


**R. R. Sgarro**  
Manager, Nuclear Regulatory Affairs

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May 14, 2012

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**BELL BEND NUCLEAR POWER PLANT  
NEED FOR INFORMATION ACC-08  
DATA FILES  
BNP-2012-121                      Docket No. 52-039**

The purpose of this letter is to transmit data files associated with the response to the Bell Bend Environmental Audit Need for Information (NFI) ACC-08 to the NRC.

Enclosure 1 contains proprietary MACCS2 input and output files provided by AREVA NP Inc., associated with the response to NFI ACC-08. AREVA NP Inc., requests that the NRC withhold the proprietary information from public disclosure in accordance with the requirements of 10 CFR 2.390. Enclosure 2 is an AREVA NP Inc., affidavit that supports proprietary treatment of this AREVA NP Inc. information, pursuant to 10 CFR 2.390.

Should you have questions or need additional information, please contact the undersigned at 570.802.8102.

Respectfully,

A handwritten signature in black ink that reads 'Rocco R. Sgarro'. The signature is written in a cursive style with a large, looped 'S' at the end.

Rocco R. Sgarro

RRS/kw

- Enclosures: 1) Need For Information ACC-08 Data Files (Data Disc)
- 2) Affidavit for Withholding of Proprietary Information in Accordance with 10 CFR 2.390, Bell Bend Nuclear Power Plant, Luzerne County Pennsylvania

D102  
NRD

cc: (w/ Enclosures)

Ms. Laura Quinn-Willingham  
Project Manager  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike Mailstop: T-6 C32  
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(w/o Enclosures)

Mr. William Dean  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

Enclosure 1

Need For Information ACC-08 Data Files

(Data Disc)

Enclosure 2

Affidavit for Withholding of Proprietary Information in Accordance with 10 CFR 2.390,  
Bell Bend Nuclear Power Plant, Luzerne County Pennsylvania

AFFIDAVIT

COMMONWEALTH OF VIRGINIA        )  
  ) ss.  
COUNTY OF CAMPBELL                    )

1.        My name is Russell D. Wells. I am U.S. EPR COLA Licensing Manager 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 "Need for Information ACC-08 Data Files," 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 has 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.

*M. Wells*

SUBSCRIBED before me this *3rd*  
day of May, 2012.

*Kathleen A. Bennett*

Kathleen A. Bennett  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/2015  
Registration No. 110864

