



September 17, 2013
NRC:13:073

Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Documents to Support the NRC review of ANP-10323P, "Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors"

AREVA NP Inc. (AREVA NP) requested NRC review and approval of topical report ANP-10323P, "Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors" in Reference 1. The NRC requested additional information to support the review in an e-mail on September 10, 2013. The additional information requested consists of References 2 through 5.

AREVA NP considers the material contained in the enclosed documents to be proprietary in their entirety. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Only proprietary versions of the documents are provided since they are considered entirely proprietary.

If you have any questions related to this submittal, please contact Ms. Gayle F. Elliott, Product Licensing Manager at 434-832-3347 or by e-mail at Gayle.Elliott@areva.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a large, faint watermark of the signature.

Pedro Salas, Director
Regulatory Affairs
AREVA NP Inc.

cc: J. A. Golla
J. G. Rowley
Project 728

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AREVA NP INC.

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Tel.: 434 832-3000 - www.areva.com

References:

- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10323P, 'Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:13:063, August 1, 2013.
- Ref. 2: FS1-0004682, Revision 2, "GALILEO Fuel Rod Performance Code Theory Manual," May 23, 2013.
- Ref. 3: FS1-0002568, Revision 2, "GALILEO Fuel Rod Performance Code Programmer's Manual," May 23, 2013.
- Ref. 4: FS1-0004683, Revision 2, "GALILEO Fuel Rod Performance Code Verification and Validation Report," May 24, 2013.
- Ref. 5: FS1-0002453, Revision 3, "GALILEO Fuel Rod Performance Code User's Manual," May 21, 2013.

Enclosures:

1. FS1-0004682, Revision 2, "GALILEO Fuel Rod Performance Code Theory Manual," May 23, 2013
2. FS1-0002568, Revision 2, "GALILEO Fuel Rod Performance Code Programmer's Manual," May 23, 2013
3. FS1-0004683, Revision 2, "GALILEO Fuel Rod Performance Code Verification and Validation Report," May 24, 2013
4. FS1-0002453, Revision 3, "GALILEO Fuel Rod Performance Code User's Manual," May 21, 2013
5. Notarized Affidavit

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(c) and 6(d) 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.

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SUBSCRIBED before me this 17th
day of September 2013.

A handwritten signature in black ink, appearing to be 'Sherry L. McFaden', written over a horizontal line.

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/2014
Reg.#7079129

