



October 14, 2013
NRC:13:076

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

Response to a Request for Additional Information Regarding ANP-10326P, Revision 0, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels"

- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10326P, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'," NRC:12:060, November 30, 2012.
- Ref. 2: E-mail, Joe Golla (NRC) to Gayle Elliott (AREVA NP Inc.), "Topical Report ANP-10326P Questions for TR Supplement," August 29, 2013.

AREVA NP Inc. (AREVA NP) requested the NRC review and approval of the topical report ANP-10326P, Revision 0, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels," dated November 2012, in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2.

This letter provides the response to the NRC RAI (Reference 2) in the report ANP-10326Q1P, "Response to NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'." A revision to the topical report, ANP-10326P Revision 1, is also provided as discussed in the RAI response.

There are no commitments contained within the contents of this letter or the enclosures to this letter.

AREVA NP considers some of the material contained in the enclosed documents to be proprietary. 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 letter, please contact Ms. Gayle F. Elliott, Product Licensing Manager at 434-832-3347, or by e-mail at Gayle.Elliott@areva.com.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Pedro Salas', is written over the word 'Sincerely,'.

Pedro Salas, Director
Regulatory Affairs

AREVA NP INC.

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

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AREVA NP Inc.

Enclosures:

1. Proprietary Version of ANP-10326P, Revision 1, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels"
2. Non-Proprietary Version of ANP-10326NP, Revision 1, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels"
3. Proprietary Version of ANP-10326Q1P, "Response to NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'"
4. Non-Proprietary Version of ANP-10326Q1NP, "Response to NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'"
5. Notarized Affidavit

cc: J. A. Golla
Project 728

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.

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 documents ANP-10326P, Revision 1, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels" and ANP-10326Q1P, "Response to NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'," dated October 2013 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:

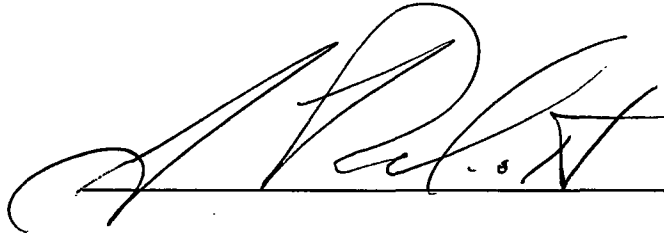
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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(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.

A handwritten signature in black ink, appearing to be 'A. R. H.', written over a horizontal line.

SUBSCRIBED before me this 14th
day of October 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

