



September 20, 2013
REL:13:039

Brian W. Smith
US Nuclear Regulatory Commission
Three White Flint North
Mail Stop 13C64
11601 Landsdown St.
North Bethesda, MD 20852

Dear Mary:

Subject: Transmittal of Documents for Inspection

Per your request find enclosed the documents for your inspection. As noted by the affidavit we request protection of the documents in accordance with 10 CFR 2.390. It is your option to return or destroy the documents following your use. If you have any questions, please feel free to contact me at 509-375-8409.

Very truly yours,

A handwritten signature in black ink that reads 'R. E. Link' followed by 'Date for REL'.

R. E. Link, Manager
Environmental, Health, Safety, & Licensing

/mah

AREVA NP INC.

2101 Horn Rapids Road, Richland, WA 99354
Tel.: 509 375 8100 - www.aveva.com

AFFIDAVIT

STATE OF WASHINGTON)
)
) ss:
COUNTY OF BENTON)

1. My name is Timothy J. Tate. I am acting Manager, Environmental, Health, Safety, & Licensing for AREVA NP Inc. ("AREVA") at AREVA's Richland, Washington facility and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the enclosed documents as requested by Brian Smith, Chief, Uranium Enrichment Branch, for inspection purposes and referred to herein as "Documents". Information contained in these documents is considered by AREVA as proprietary in accordance with the policies established by AREVA.

4. These Documents contain information of a proprietary and confidential nature and of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information identified and contained in these Documents 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 to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's methods and techniques to provide management controls.
- (b) Use of the information by a competitor could 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 reveals certain distinguishing aspects of procedures, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (d) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information identified in these Documents is considered proprietary for the reasons set forth above. In particular, AREVA has expended considerable sums of money to develop the facility modifications described in these documents. The release of the AREVA documents would allow a competitor to develop a similar process without incurring the significant expense of having to develop that process.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreements providing for nondisclosure and limited use of the information.

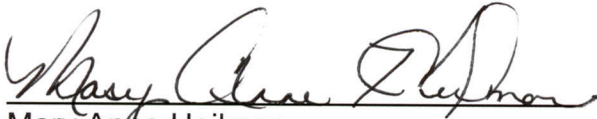
8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



Timothy J. Tate, Acting Manager
Environmental, Health, Safety, & Licensing
AREVA NP Inc.

SUBSCRIBED before me this 20th day of September 20, 2013.



Mary Anne Heilman
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: June 6, 2016

