

June 16, 2014 NRC:14:034

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

NRC Review of ANP-10323P, "Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors"

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.

AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report ANP-10323P, "Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors" in Reference 1. In a telephone call on May 13, 2014, the NRC requested a copy of the GALILEO code, which is part of the ANP-10323P methodology. An executable version of the GALILEO code is contained on the enclosed compact disk. Installation instructions and sample cases to verify installation are also contained on the enclosed compact disk.

AREVA proposes to provide an engineer to support the NRC installation of the GALILEO code on an NRC computer at a mutually agreeable date.

AREVA considers the information contained on the enclosed compact disk to be proprietary in its entirety. 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 information, please contact Gayle F. Elliott by telephone at (434) 832-3347, or by e-mail at Gayle.Elliott@areva.com.

Sincerely,

Pedro Salas, Director Regulatory Affairs

AREVA Inc.

-T007 --- URR cc:

J. L. Dean M. M. Panicker Project 728

Enclosures:

- 1. Compact disk containing proprietary information
- 2. Notarized Affidavit

AFFIDAVIT

COMMONWEALTH OF VIRGINIA))	
))	SS
CITY OF LYNCHBURG))	

- My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA Inc.
 (AREVA) 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 attachment to letter, Pedro Salas (AREVA) to Document Control Desk (NRC) entitled "NRC Review of ANP-10323P, 'Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:14:034, dated June 13, 2014 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 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 to determine whether information should be classified as proprietary:
 - (a) The information reveals details of AREVA'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.
 - (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
 - (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

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'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 only as required and under suitable agreement providing for nondisclosure and limited use of the information.

- 8. AREVA 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.



SUBSCRIBED before me this

lay of IDM/ 2014

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA

MY COMMISSION EXPIRES: 10/31/2014

Reg.#7079129

SHERRY L. MCFADEN Notary Public Commonwealth of Virginia 7079129

My Commission Expires Oct 31, 2014