

March 20, 2015 NRC:15:014

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

Proprietary Viewgraphs for the NRC Post Submittal Meeting on the Zry-BWR Fuel Channel Supplement

Ref. 1: Meeting Notice Memorandum, "Closed Post Submittal Meeting with AREVA Inc. Regarding Topical Report EMF-93-177P-A, Revision 1, Supplement 2P, Revision 0, "Mechanical Design For BWR [Boiling Water Reactor] Fuel Channels Supplement 2: Zircaloy-BWR Fuel Channels," February 24, 2015, Accession Number: ML15050A143.

A post submittal meeting between AREVA Inc. (AREVA) and the NRC was held on March 3, 2015 (Reference 1). The final Proprietary and non-proprietary viewgraphs presented during the meeting are enclosed.

AREVA considers some of the material contained in the attachment 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 information, please contact Mr. Alan Meginnis by telephone at (509) 554-4584, or by e-mail at Alan.Meginnis@areva.com.

Sincerety

Pedro Salas, Director

Licensing & Regulatory Affairs

AREVA Inc.

cc:

J. G. Rowley Project 728

Enclosures:

- 1. Proprietary viewgraphs, "EMF-93-177P-A, Revision 1, Supplement 2P, Post-Submittal Meeting," AREVA Inc., March 3, 2015.
- 2. Non-proprietary viewgraphs "EMF-93-177P-A, Revision 1, Supplement 2P, Post-Submittal Meeting," AREVA Inc., March 3, 2015.
- 3. Notarized affidavit

TOOT

AREVA INC.

AFFIDAVIT

| STATE OF WASHINGTON |) | |
|---------------------|---|----|
| |) | SS |
| COUNTY OF BENTON |) | |

- 1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA Inc. and as such I am authorized to execute this Affidavit.
- 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 Enclosure 1 to the Letter NRC:15:014, "Proprietary Viewgraphs for the NRC Post Submittal Meeting on the Zry-BWR Fuel Channel Supplement," dated March, 2015 and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA 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(b), 6(d) and 6(e) above.

- 7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document have 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.

du & Meg

SUBSCRIBED before me this 12th

Susan K. McCoy

NOTARY PUBLIC, STATE OF WASHINGTON

MY COMMISSION EXPIRES: 1/14/2016