



June 23, 2015  
NRC:15:030

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

**GAIA Lead Test Assembly Project at Duke Energy Harris Nuclear Plant**

During a meeting with the NRC on April 9, 2014, Duke Energy stated that AREVA Inc. (AREVA) would provide the NRC a generic mechanical design criteria evaluation summary as a courtesy in support of the GAIA Lead Test Assembly Project at Harris Nuclear Plant.

Enclosed for information are proprietary and non-proprietary versions of report ANP-3389, Revision 0, "Shearon Harris Unit 1 GAIA Lead Test Assembly Licensing Analysis Summary Report."

AREVA considers some of the material contained in the enclosed document 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 Ms. Gayle Elliott by telephone at (434) 832-3347, or by e-mail at [Gayle.Elliott@areva.com](mailto: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 AREVA logo.

Pedro Salas, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

Enclosures:

1. ANP-3389P, Revision 0, "Shearon Harris Unit 1 GAIA Lead Test Assembly Licensing Analysis Summary Report"
2. ANP-3389NP, Revision 0, "Shearon Harris Unit 1 GAIA Lead Test Assembly Licensing Analysis Summary Report"
3. Notarized Affidavit

cc: J.G. Rowley  
Project 728

**AREVA INC.**

3315 Old Forest Road, Lynchburg, VA 24501  
Tel.: 434 832 3000 - [www.areva.com](http://www.areva.com)

D077  
NRD

AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG            )

1. My name is Gayle 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 document ANP-3389P, Revision 0, "Shearon Harris Unit 1 GAIA Lead Test Assembly Licensing Analysis Summary Report," dated June 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 Inc. 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:

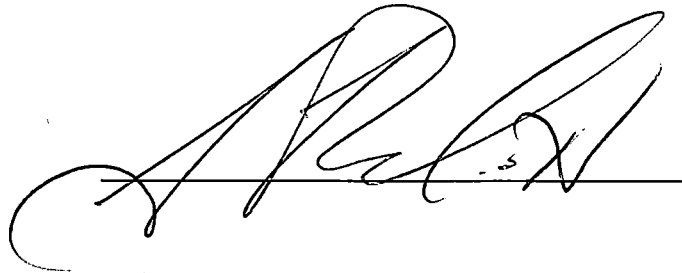
- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (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 this Document is considered proprietary for the reasons set forth in paragraphs 6(c) through 6(e) 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.

A large, stylized handwritten signature in black ink, written over a horizontal line.

SUBSCRIBED before me this 23<sup>rd</sup>  
day of June, 2015.

A handwritten signature in black ink, written over a horizontal line.

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/18  
Reg. # 7079129

