



PROPRIETARY INFORMATION – WITHHOLD UNDER 10 CFR 2.390

RS-15-237

10 CFR 50.90

September 1, 2015

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Supplemental Information in Support of Request for License Amendment
Regarding Transition to AREVA Fuel

- References:
- (1) Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Request for License Amendment Regarding Transition to AREVA Fuel," dated February 6, 2015
 - (2) Email from Eva Brown (U. S. NRC) to Kenneth Nicely (Exelon Generation Company, LLC), et al, "ACTION: Dresden/Quad Cities - Proprietary Determination - Attachment 8 and 10 to February 6, 2015 Submittal," dated July 28, 2015

In Reference 1, Exelon generation Company, LLC (EGC) requested an amendment to Renewed Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station (DNPS) Units 2 and 3, and Renewed Facility Operating License Nos. DPR-29 and DPR-30 for Quad Cities Nuclear Power Station (QCNPS) Units 1 and 2. The proposed change supports the transition from Westinghouse SVEA-96 Optima2 (Optima2) fuel to AREVA ATRIUM 10XM fuel at DNPS and QCNPS.

In Reference 2, the NRC indicated that their review of Reference 1 identified a number of deficiencies with the proprietary markings in the AREVA proprietary reports provided as Attachments 8 and 10 to Reference 1. The NRC stated in Reference 2, that the noted

**Attachments 1 through 6 transmitted herewith contain Proprietary Information.
When separated from this attachment, this document is decontrolled.**

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discrepancies are not an all-inclusive list. Therefore, based on the examples of discrepancies provided, AREVA reviewed all the proprietary documents submitted with Reference 1 and has revised the affected proprietary reports to address any deficiencies identified. EGC is supplementing Reference 1 to address the NRC identified proprietary deficiencies by providing the revised reports and affidavits with this letter.

The following attachments are included in support of this proposed change:

- Attachment 1: Applicability of AREVA Methodology (Proprietary Version)
- Attachment 2: Mechanical Design Report (Proprietary Version)
- Attachment 3: Fuel Rod Thermal-Mechanical Design Report (Proprietary Version)
- Attachment 4: Fuel Cycle Design Report (Proprietary Version)
- Attachment 5: LOCA Break Spectrum Analysis Report (Proprietary Version)
- Attachment 6: Nuclear Fuel Design Report (Proprietary Version)
- Attachment 7: AREVA Affidavits
- Attachment 8: Applicability of AREVA Methodology (Non-Proprietary Version)
- Attachment 9: Mechanical Design Report (Non-Proprietary Version)
- Attachment 10: Fuel Rod Thermal-Mechanical Design Report (Non-Proprietary Version)
- Attachment 11: Fuel Cycle Design Report (Non-Proprietary Version)
- Attachment 12: LOCA Break Spectrum Analysis Report (Non-Proprietary Version)
- Attachment 13: Nuclear Fuel Design Report (Non-Proprietary Version)

Attachments 1 through 13 to this letter supersede in full Attachments 7, 8, 10, 11, 13, 15, 16, 17, 18, 20, 21, 23, and 25 of Reference 1, respectively.

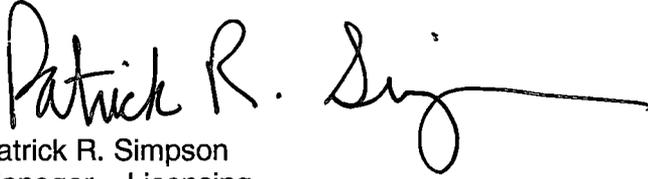
EGC has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of Reference 1. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Mr. Timothy A. Byam at (630) 657-2818.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 1st day of September 2015.

Respectfully,

A handwritten signature in black ink that reads "Patrick R. Simpson". The signature is fluid and cursive, with a long horizontal stroke extending to the right from the end of the name.

Patrick R. Simpson
Manager – Licensing

Attachments:

1. Applicability of AREVA Methodology (Proprietary Version)
2. Mechanical Design Report (Proprietary Version)
3. Fuel Rod Thermal-Mechanical Design Report (Proprietary Version)
4. Fuel Cycle Design Report (Proprietary Version)
5. LOCA Break Spectrum Analysis Report (Proprietary Version)
6. Nuclear Fuel Design Report (Proprietary Version)
7. AREVA Affidavits
8. Applicability of AREVA Methodology (Non-Proprietary Version)
9. Mechanical Design Report (Non-Proprietary Version)
10. Fuel Rod Thermal-Mechanical Design Report (Non-Proprietary Version)
11. Fuel Cycle Design Report (Non-Proprietary Version)
12. LOCA Break Spectrum Analysis Report (Non-Proprietary Version)
13. Nuclear Fuel Design Report (Non-Proprietary Version)

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station
Illinois Emergency Management Agency – Division of Nuclear Safety

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Attachment 7
AREVA Affidavits

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.

on 3rd May 2015

SUBSCRIBED before me this 18th
day of August, 2015.

Mary Anne Heilman

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



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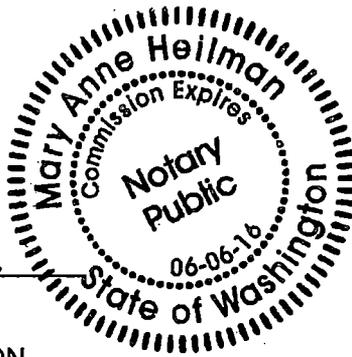
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9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Alan B. Meyer

SUBSCRIBED before me this 18th
day of August, 2015.

Mary Anne Heilman



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

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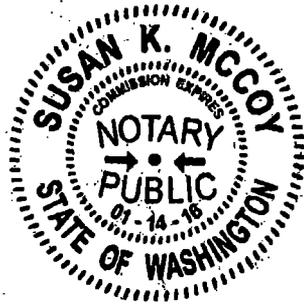
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Al B. Meyer

SUBSCRIBED before me this 13th
day of August, 2015.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/14/2016



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

Dr. S. Meyer

SUBSCRIBED before me this 12th
day of August, 2015.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/14/2016



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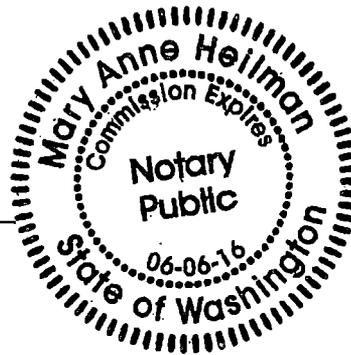
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Al B. Meyer

SUBSCRIBED before me this 18th
day of August, 2015.

Mary Anne Heilman

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



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Am 3 McCoy

SUBSCRIBED before me this 10th
day of August, 2015.

Susan K McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/14/2016

