ATTACHMENT 51

AREVA Affidavits

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 the report ANP-2860P Revision 2, Supplement 2P Revision 1, "Browns Ferry Unit 1 – Summary of Responses to Request for Additional Information Extension for Use of ATRIUM 10XM Fuel for Extended Power Uprate," dated August 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.
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- (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.

alan & Mig

SUBSCRIBED before me this 12^{+1} day of Angus _, 2015.

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



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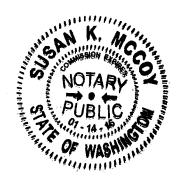
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ah 2 Megi

SUBSCRIBED before me this 12^{1} day of Marc , 2015.

AN

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



STATE OF WASHINGTON)) ss. COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

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

3. I am familiar with the AREVA NP information contained in the report ANP-3342P, Revision 1, "Browns Ferry EPU (120% OLTP) Equilibrium Fuel Cycle Design," dated August 2015 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.

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3. I am familiar with the AREVA NP information contained in the report ANP-3343P, Revision 0, "Nuclear Fuel Design Report Browns Ferry EPU (120% OLTP) Equilibrium Cycle ATRIUM 10XM Fuel," dated October 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.

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SUBSCRIBED before me this _____ day of Hugust __, 2015.

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alon & maji -

SUBSCRIBED before me this 194day of <u>August</u>, 2015.

us

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



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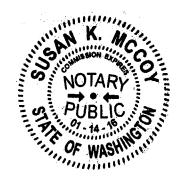
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alan 3 Meg

SUBSCRIBED before me this ______ day of <u>Angn</u> _, 2015.

user

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



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3. I am familiar with the AREVA information contained in the report ANP-3384P, Revision 3, "Browns Ferry Units 1, 2, and 3 LOCA-ECCS Analysis MAPLHGR Limits for ATRIUM-10 Fuel (EPU)," dated August 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.

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Alan & Megn

SUBSCRIBED before me this _____ + 9 + day of August _, 2015.

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



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alan 13 Meg.

SUBSCRIBED before me this _____

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C

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



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Susan K. McCoy

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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.

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SUBSCRIBED before me this 20 th day of ____ 2015.

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

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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 the report ANP-3409P, Revision 2, "Fuel-Related Emergent Regulatory Issues," dated August 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.

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.

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

information, and belief.

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SUBSCRIBED before me this _____

day of August, 2015.

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



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3. I am familiar with the AREVA information contained in the report FS1-0019629, Revision 1, "Browns Ferry Unit 3 Cycle 19 MCPR Safety Limit Analysis With SAFLIM3D Methodology," 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.

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SUBSCRIBED before me this _25 day of <u>March</u>, 2015.

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

