



October 5, 2015  
NRC:15:039

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

**Informational Transmittal Regarding the ATRIUM 11 Lead Test Assembly Program at Browns Ferry Nuclear Plant Unit 2**

Ref. 1: ANF-89-98(P)(A), Revision 1 and Supplement 1, "Generic Mechanical Design Criteria for BWR Designs," Advanced Nuclear Fuels Corporation, May 1995.

Attached for the NRC's information is ANP-3407P, "Browns Ferry Unit 2 ATRIUM 11 Lead Test Assemblies Design & Licensing Summary Report." This report provides an overview of the ATRIUM 11 LTA Program at the Browns Ferry Nuclear Plant Unit 2 and is being forwarded to the NRC in support of our lead program which is addressed in NRC approved topical report ANF-89-98(P)(A), Revision 1, and Supplement 1, "Generic Mechanical Design Criteria for BWR Designs," (Reference 1).

Proprietary and non-proprietary versions of the report are enclosed. AREVA Inc. considers some of the material contained in the report 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.

There are no commitments contained within the enclosures to this letter.

If you have any questions related to this information, please contact Alan Meginnis by telephone at (509) 374-8266, or by e-mail at [Alan.Meginnis@areva.com](mailto:Alan.Meginnis@areva.com).

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Pedro Sajas', is written over the word 'Sincerely,' and extends across the signature block.

Pedro Sajas, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

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)

T007  
NRR

Enclosures:

1. Affidavit
2. Proprietary Version - ANP-3407P, Revision 0, "Browns Ferry Unit 2 ATRIUM 11 Lead Test Assemblies Design & Licensing Summary Report." AREVA Inc. July 2015.
3. Non-Proprietary Version - ANP-3407NP, Revision 0, "Browns Ferry Unit 2 ATRIUM 11 Lead Test Assemblies Design & Licensing Summary Report." AREVA Inc. July 2015.

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.

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 report ANP-3407P, Revision 0, "Browns Ferry Unit 2 ATRIUM 11 Lead Test Assemblies Design & Licensing Summary Report," dated September 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.

Alan B. Megrini

SUBSCRIBED before me this 4th  
day of September, 2015.

Susan K. McCoy

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

