



November 25, 2015  
NRC:15:047

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

**Request for Review and Approval of BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"**

AREVA Inc. (AREVA) requests the NRC's review and approval of the topical report BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants" for referencing in licensing actions.

The supplement addresses the method of analysis changes for the adjustments of the fuel pin input and steady-state initialization process for the LOCA transient codes to adequately account for fuel thermal conductivity degradation (TCD) with burnup.

In support of the Office of Nuclear Reactor Regulation's prioritization efforts, the Topical Report Prioritization Scheme is included as an enclosure with this letter.

AREVA would appreciate the NRC approval of this topical report by the end of the third quarter of calendar year 2016.

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. A proprietary version and a non-proprietary version of the report are enclosed.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Mr. Morris E. Byram, Product Licensing Manager, by telephone at (434) 832-4665, or by e-mail at [Morris.Byram@areva.com](mailto:Morris.Byram@areva.com).

Sincerely,

*Philip A. Opsal*  
*Patricia A. Opsal*  
For Gayle F. Elliott, Interim Director  
Licensing & Regulatory Affairs  
AREVA Inc.

**AREVA INC.**

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

T007  
NRK

cc: J. G. Rowley  
Project 728

Enclosures :

1. Proprietary copy of topical report BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"
2. Non-Proprietary copy of topical report BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"
3. BAW-10192PA-00, Supplement 1, Revision 0 Priority Form
4. Notarized Affidavit

A F F I D A V I T

COMMONWEALTH OF VIRGINIA    )  
                                                  ) ss.  
CITY OF LYNCHBURG                    )

1.       My name is Morris Byram. 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 the AREVA document BAW-10192PA-00, Supplement 1P, Rev. 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants," 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) and 6(d) 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.

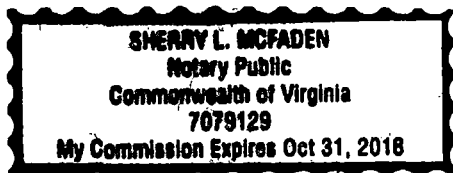
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Monis E. Byngh

SUBSCRIBED before me this 25<sup>th</sup>  
day of November, 2015.

Sherry L. McFaden

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



TR Prioritization Scheme			
Title: BAW-10192PA-00, Supplement 1, Rev. 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"			
Expect submitting FY	TAC	PM	Today's Date: 11/25/2015
Technical Review Division(s)		Technical Review Branch(s)	
Factors	Select the Criteria That the TR satisfies	Points can be Assigned for Each Criteria	Assigned Points
TR Classification (Select one only)	Resolve Generic Safety Issue (GSI)	6	3
	Emergent NRC Technical Issue	3	
	New technology improves safety	2	
	TR Revision reflecting current requirements or analytical methods.	2	
	Standard TR	1	
TR Applicability (Select one only)	Potential industry-wide applications	3	1
	Potentially applicable to entire groups of licensees.	2	
	Intended for only partial groups of licensees.	1	
TR Implementation Certainty (Select one only)	Industry-wide Implementation expected	3	2
	Expected implementation by an entire group of licensees (BWROG, PWROG, BWRVIP, etc.) who sponsored the TR.	2	
	Docketed intent by U.S. plant(s) but no formal LAR schedule yet	1	
	No US plants have indicated strong intent on docket to implement yet.	0	
Tie to a LAR (Select if applicable)	A SE is requested by a certain date (less than two years) to support a licensing activity or renewal date (note it in Comments)	3	3
Review Progress (Points are cumulative as applicable)	Accepted for review	0.3	
	RAI issued	0.5	
	RAI responded	1.2	
	SE Drafted	2.0	
Management (LT/ET) discretion adjustment		-3 to +3	
Total Points (Add the total points from each factor and total here):			9
Comments: Request SE before the end of the third quarter 2016.			