

70-1257



January 26, 2016  
TJT:16:006

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk (03-H8)  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

**Subject: AREVA Inc. (Richland) Summary of Facility Changes Made during Calendar Year 2015**

Enclosed is a summary of facility changes made since January 1, 2015 which did not require pre-approval.

This summary is being submitted in accordance with 10 CFR 70.72 (d)(2). AREVA requests that this annual update be withheld in its entirety from public disclosure in accordance with 10 CFR 2.390 or 10 CFR 2.790 in that it contains information that is either commercially proprietary in nature or contains security-related information.

Technical contact information relative to the Richland Site ISA is as follows:

AREVA Inc.  
Attn: Calvin D. Manning, Manager  
Nuclear Criticality Safety  
2101 Horn Rapids Road  
Richland, WA 99354  
Phone: 509-375-8237  
Email: [calvin.manning@areva.com](mailto:calvin.manning@areva.com)

Additionally, I can be reached at 509-375-8550 or via email at [timothy.tate@areva.com](mailto:timothy.tate@areva.com).

Very truly yours,

A handwritten signature in cursive script that reads 'T. J. Tate'.

T. J. Tate, Manager  
Environmental, Health, Safety & Licensing

c: Leira Cuadrado, NRC  
Carmen Rivera, NRC

Attachment A: 10CFR70.72 (d)(2) - Required Listing of Changes Not Requiring NRC Pre-Approval.

**AREVA INC.**

2101 Horn Rapids Road, Richland WA 99354  
Tel.: 509 375 8100 - [www.aveva.com](http://www.aveva.com)

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# AFFIDAVIT

STATE OF WASHINGTON     )  
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COUNTY OF BENTON     )     ss

**Timothy J. Tate**, being duly sworn on oath, states as follows:

1. I am employed by AREVA Inc. (AREVA) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at AREVA's Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the contents of the "Summary of Facility Changes made During Calendar Year 2015." The AREVA Inc., Richland, Washington Fuel Fabrication Facility "Annual Summary Update of Facility Changes" provides the annual listing of changes to the Richland Site as required by 10CFR70.72 (d)(2). This Annual Summary Update has been classified and designated as "Proprietary" by AREVA in accordance with the document control system and policies established by AREVA for the control and protection of proprietary and confidential information.

3. AREVA is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as AREVA. Competition among these companies including AREVA is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The Annual Summary of Facility Changes contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in the Annual of Facility Changes Summary is commercial and confidential because it:

- A. Reveals distinguishing aspects of AREVA's manufacturing processes by relating sequences of operations and/or sub-operations to optimize the efficiency and performance of manufacturing operations which a competitor within the field of nuclear fuel manufacturing may adapt for their own processes, reducing the competitor's expenditure of resources to achieve the same efficiencies, thereby gaining a competitive advantage to the disadvantage of AREVA.
- B. Reveals aspects of privately funded development of process controls and parameters derived by AREVA over the course of optimizing the performance of waste treatment and other processes.
- C. Reveals technical rationale developed by AREVA relating to plant layout, structure, process flow and other technical information which a competitor could readily use without expenditure of funds and replicate in its facilities thereby gaining a competitive advantage to the disadvantage of AREVA.

5. AREVA Inc. will suffer considerable competitive harm if the contents of the Annual Summary of Facility Changes are made available to AREVA domestic and international competitors.

Dated this 26 day of January, 2016.



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Timothy J. Tate  
Manager, Environmental, Health, Safety and Licensing

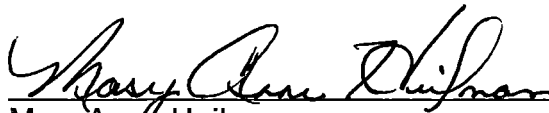
STATE OF WASHINGTON )

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COUNTY OF BENTON )

On this 26<sup>th</sup> day of January, 2016, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Timothy J. Tate to me known to be the Manager, Environmental, Health, Safety and Licensing of AREVA Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.



Mary Anne Heilman  
Notary Public in and for the State of Washington  
residing at Benton, Washington.  
MY COMMISSION EXPIRES: June 6, 2016

