



January 29, 2016  
NRC:16:001

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

**Response to Third Request for Additional Information Regarding ANP-10326P "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels"**

AREVA Inc. (AREVA) transmitted revision 1 of the topical report ANP-10326P, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels," dated October 2013, in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. AREVA responded to this request in Reference 3. The NRC provided a subsequent Request for Additional Information (RAI) in Reference 4.

This letter provides the response to the latest NRC RAI (Reference 4) for topical report ANP-10326Q3P, "Response to Third NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'."

Marked-up revision pages to the topical report, ANP-10326P, Revision 1, are also provided and included in the RAI response report enclosed. Pending confirmation that these changes are acceptable, AREVA proposes to revise ANP-10326P, Revision 1 in the approved version of the topical report after issuance of the NRC safety evaluation.

There are no new commitments contained within this correspondence.

AREVA considers some of the material contained in the enclosed documents 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. Please note that AREVA has determined that a portion of the RAI, as marked in the enclosure is proprietary.

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

Sincerely,

A handwritten signature in cursive script that reads "Gary Peters".

Gary Peters, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

5077  
NRD

**AREVA INC.**

References:

- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding ANP-10326P, Revision 0, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'," NRC:13:076, October 14, 2013.
- Ref. 2: Letter, Dennis J. Galvin (NRC) to Pedro Salas (AREVA Inc.), "Request for Additional Information Regarding AREVA NP, Inc. Topical Report ANP-10326P, Revision 1, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels Topical Report'," April 29, 2015.
- Ref. 3: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding ANP-10326P, Revision 1, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'," NRC:15:027, June 5, 2015.
- Ref. 4: Email, Mark Lintz (NRC) to Morris Byram (AREVA Inc.), Sending final RAI file entitled, "03 - ANP final RAI - 16 Oct 15," October 16, 2015.

Enclosures:

1. Proprietary Version of ANP-10326Q3P, Revision 0, "Response to Third NRC Request for Additional Information, ANP-10326P, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'"
2. Non-Proprietary Version of ANP-10326Q3NP, Revision 0, "Response to Third NRC Request for Additional Information, ANP-10326P, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'"
3. Notarized Affidavit

cc: M. Lintz  
Project 728



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.

