



August 12, 2016  
NRC:16:021

Mr. Matthew Gordon  
Office of Nuclear Regulatory Research  
11555 Rockville Pike  
Rockville, MD 20852

PRDS0728

**Submittal of CD for Requested Surveillance Licensing Topical Reports**

Per your request, enclosed is a CD with the requested topical reports containing surveillance data to assist in your summary on the adequacy of the Regulatory Guide 1.99, Revision 2. These reports are provided for information only.

AREVA considers some of the material contained in the enclosed CD 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. Note that due to the age of some of the documents identified on the affidavit, the document itself may not be marked in accordance with 10 CFR 2.390(b) although the affidavit clearly identifies the report as proprietary.

If you have any questions related to this information, please contact Ms. Gayle F. Elliott, Deputy Director, Licensing & Regulatory Affairs, by telephone at (434) 832-3347, or by e-mail at [Gayle.Elliott@areva.com](mailto:Gayle.Elliott@areva.com).

Sincerely,

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

Gary Peters, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

cc: J.G. Rowley  
Project 728

TDD7  
YGD1  
NRR

**AREVA INC.**



Information contained in these Documents has been classified by AREVA as proprietary in full in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4. These Documents contain 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 these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 these Documents is considered proprietary for the reasons set forth in paragraphs 6(c); 6(d) and 6(e) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in these Documents 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.

SUBSCRIBED before me this 12th  
day of August, 2016.

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

