AREVA

November 4, 2016
NRC:16:028

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

Response to Request for Additional Information Regarding ANP-10334P, "Q12™ Structural Material"

Ref. 1: Letter Pedro Salas (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10334P, 'Q12™ Structural Material'," NRC:15:042, October 29, 2015.

Ref 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Regarding AREVA Inc. Topical Report ANP-10334P, 'Q12™ Structural Material,' (TAC No. MF7128)," September 6, 2016.

AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report ANP-10334P, "Q12™ Structural Material" in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. The responses to RAIs 1, 2, 4 and 5 are enclosed with this letter. The response to RAI 3 will be provided at a later date.

AREVA considers some of the information 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. Proprietary and non-proprietary versions of the RAI responses are enclosed. There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Ms. Gayle F. Elliott by telephone at (434) 832-3347, or by e-mail at Gayle.Elliott@areva.com.

Sincerely,

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

YG01
NRR

Enclosures:

1 Proprietary copy of ANP-10334Q1P, "Response to Request for Additional Information-ANP-10334P."
2 Non-Proprietary copy of ANP-10334Q1NP, "Response to Request for Additional Information-ANP-10334P."
3 Notarized Affidavit

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs, 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 following document: "ANP-10334Q1P, 'Response to Request for Additional Information – ANP-10334P'," dated November 2016 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), 6(d), 6(e) 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.

SUBSCRIBED before me this 4th

day of November, 2016.

309873

Ella Carr-Payne
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA

ELLA F. CARR-PAYNE
NOTARY PUBLIC
REG # 309873
MY COMMISSION EXPIRES
8/31/2017
COMMONWEALTH OF VIRGINIA