



December 22, 2016
NRC:16:039

PROJ0728

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

Supplemental Information Regarding Topical Report ANP-10335P, Revision 0, "ACE/TRIUM 11 Critical Power Correlation"

AREVA Inc. (AREVA) requested the NRC review and approval of Topical Report (TR) ANP-10335P, Revision 0, "ACE/TRIUM 11 Critical Power Correlation" in Reference 1. The NRC provided a Request for Additional Information (RAI) regarding this TR in Reference 2. The responses to the Reference 2 RAI are included in Reference 3. The enclosure to this letter provides supplemental information to qualify the ACE/TRIUM 11 critical power correlation for use with the AURORA-B Methods.

AREVA considers some of the material contained in the enclosed to be proprietary. As required by 10 CFR 2.390(b), an affidavit is attached to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the attached RAI responses are provided.

If you have any questions related to this information, please contact Mr. Alan B. Meginnis by telephone at (509) 375-8266, or by e-mail at Alan.Meginnis@areva.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary Peters', is written over the typed name and title.

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

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NRR

AREVA INC.

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References:

- Ref. 1: Letter, P. Salas (AREVA) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10335P Revision 0, 'ACE/TRIUM 11 Critical Power Correlation'," NRC:15:012, February 27, 2015.
- Ref. 2: Letter, Jonathan Rowley (NRC) to Gary Peters (AREVA), "Request for Additional Information RE: AREVA, Inc. Topical Report ANP-10335P/NP, Revision 0, 'ACE/TRIUM 11 Critical Power Correlation', (TAC NO. MF5841)," April 11, 2016.
- Ref 3: Letter, G. Peters (AREVA) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding Topical Report ANP-10335P, Revision 0, 'ACE/TRIUM 11 Critical Power Correlation'," NRC:16:020, August 11, 2016.

Enclosures:

1. Affidavit for Withholding of Proprietary Information.
2. A Proprietary copy of the Report ANP-10335Q2P, Revision 0, "ACE/TRIUM 11 Critical Power Correlation – RAIs."
3. A Non-Proprietary copy of the Report ANP-10335Q2NP, Revision 0, "ACE/TRIUM 11 Critical Power Correlation – RAIs."

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA Inc. 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 report ANP-10335Q2P, Revision 0, "ACE/ATRIUM 11 Critical Power Correlation - RAIs," dated December, 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 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 the Document is considered proprietary for the reasons set forth in paragraphs 6(a), 6(b), 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 this Document have 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.

Ala & Meg

SUBSCRIBED before me this 20th
day of December, 2016.

Susan K McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/14/2020

SUSAN K MCCOY
NOTARY PUBLIC - WASHINGTON
MY COMMISSION EXPIRES 01-14-2020