



January 24, 2017  
NRC:17:005

PROJ0728

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

**Response to Request for Additional Information Regarding BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"**

- Ref. 1: Letter Gayle F. Elliott (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of BAW-10192PA-00, Supplement 1, Revision 0 'BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants'," NRC:15:047, November 25, 2015.
- Ref. 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Re: AREVA Inc. Topical Report BAW-10192PA-00, Supplement 1, Revision 0, 'BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants' (CAC No. MF7145)", September 22, 2016.

AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report BAW-10192PA-00, Supplement 1, Revision 0, "BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants" in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. The response to this RAI is enclosed with this letter.

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, Product Licensing Manager, by telephone at (434) 832-3347, or by e-mail at Gayle.Elliott@areva.com.

Sincerely,

Gary Peters, Director  
Licensing & Regulatory Affairs  
AREVA NP Inc.

TOOT  
YGD1  
NRR

**AREVA INC.**

cc: J. G. Rowley  
Project 728

Enclosures:

- 1 Proprietary version of BAW-10192PA, Rev. 0, Supplement 1P, Rev. 0, Q1P, Revision 0, 'Response to Request for Additional Information – BAW-10192PA, Revision 0, Supplement 1P, Revision 0'."
- 2 Non-proprietary version of BAW-10192PA, Rev. 0, Supplement 1P, Rev. 0, Q1P, Revision 0, 'Response to Request for Additional Information – BAW-10192PA, Revision 0, Supplement 1P, Revision 0'."
- 3 Notarized Affidavit



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.

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.

Tan Ryan

SUBSCRIBED before me this 19th  
day of January, 2017.

Sherry L. McFaden

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

